

Libby Asbestos Project Libby, Montana

**ADMINISTRATIVE
RECORD**

Modification to Laboratory Activities

June 2003



Request for Modification to Laboratory Activities

016	EPA - Jim Christiansen
Copy Number	Issued to

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**Requests for Modification
to
EPA Region 8 Laboratory Activities**

Index

Modification No.	Method	Description of Modification	Laboratory Applicability	Duration	Date Issued	Prepared by:	Applicable to:
LB-000001	ISO	Original data recorded using historical laboratory nomenclature at RESI. Data sheets updated to ISO 10312 nomenclature and empty fields were filled in and data was entered into the Excel spreadsheet	COCs: 03213, 03193, 03194, 03195, and 03196	Temporary	10/29/2002	J. Orr/Reservoirs	RES 67867
LB-000002	ISO	Original data recorded using historical laboratory nomenclature at RESI. Data sheets updated to ISO 10312 nomenclature and empty fields were filled in and data was entered into the Excel spreadsheet	Phase 1 data set. COC n/a	Temporary	10/29/2002	J. Orr/Reservoirs	RES 72240
LB-000003	ISO	Original data recorded using historical laboratory nomenclature at RESI. Data sheets updated to ISO 10312 nomenclature and empty fields were filled in and data was entered into the Excel spreadsheet	Phase 1 data set. COC n/a	Temporary	10/29/2002	J. Orr/Reservoirs	RES 72242
LB-000004	ISO	Original data recorded using historical laboratory nomenclature at RESI. Data sheets updated to ISO 10312 nomenclature and empty fields were filled in and data was entered into the Excel spreadsheet	Phase 1 data set. COC n/a	Temporary	10/29/2002	J. Orr/Reservoirs	RES 74033
LB-000005	ISO	Original data recorded using historical laboratory nomenclature at RESI. Data sheets updated to ISO 10312 nomenclature and empty fields were filled in and data was entered into the Excel spreadsheet	Phase 1 data set. COC n/a	Temporary	10/29/2002	J. Orr/Reservoirs	RES 74035
LB-000006	ISO	Original data recorded using historical laboratory nomenclature at RESI. Data sheets updated to ISO 10312 nomenclature and empty fields were filled in and data was entered into the Excel spreadsheet	Phase 1 data set. COC n/a	Temporary	10/29/2002	J. Orr/Reservoirs	RES 74036
LB-000007	ISO	Original data recorded using historical laboratory nomenclature at RESI. Data sheets updated to ISO 10312 nomenclature and empty fields were filled in and data was entered into the Excel spreadsheet	Phase 1 data set. COC n/a	Temporary	10/29/2002	J. Orr/Reservoirs	RES 74037

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LB-000008	ISO	Original data recorded using historical laboratory nomenclature at RESI. Data sheets updated to ISO 10312 nomenclature and empty fields were filled in and data was entered into the Excel spreadsheet	Phase 1 data set. COC n/a	Temporary	10/29/2002	J. Orr/Reservoirs	RES 74038
LB-000009	ISO	Original data recorded using historical laboratory nomenclature at RESI. Data sheets updated to ISO 10312 nomenclature and empty fields were filled in and data was entered into the Excel spreadsheet	Phase 1 data set. COC n/a	Temporary	10/29/2002	J. Orr/Reservoirs	RES 74157
LB-000010	ISO	Original data recorded using historical laboratory nomenclature at RESI. Data sheets updated to ISO 10312 nomenclature and empty fields were filled in and data was entered into the Excel spreadsheet	Phase 1 data set. COC n/a	Temporary	10/29/2002	J. Orr/Reservoirs	RES 74158
LB-000011	ISO	Original data recorded using historical laboratory nomenclature at RESI. Data sheets updated to ISO 10312 nomenclature and empty fields were filled in and data was entered into the Excel spreadsheet	Phase 1 data set. COC n/a	Temporary	10/29/2002	J. Orr/Reservoirs	RES 74159
LB-000012	ISO	Original data recorded using historical laboratory nomenclature at RESI. Data sheets updated to ISO 10312 nomenclature and empty fields were filled in and data was entered into the Excel spreadsheet	Phase 1 data set. COC n/a	Temporary	10/29/2002	J. Orr/Reservoirs	RES 74160
LB-000013	ISO	Original data recorded using historical laboratory nomenclature at RESI. Data sheets updated to ISO 10312 nomenclature and empty fields were filled in and data was entered into the Excel spreadsheet	Phase 1 data set. COC n/a	Temporary	10/29/2002	J. Orr/Reservoirs	RES 74409
LB-000014	ISO	Original data recorded using historical laboratory nomenclature at RESI. Data sheets updated to ISO 10312 nomenclature and empty fields were filled in and data was entered into the Excel spreadsheet	Phase 2 data set. COC n/a	Temporary	10/29/2002	J. Orr/Reservoirs	RES 76750
LB-000015	PCM-NIOSH 7400	Permanent modifications and clarifications to the Phase Contrast Microscopy analysis of air samples using NIOSH 7400	All	Permanent	10/30/02	J. Orr/Reservoirs	All data reports

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Modification No.	Method	Description of Modification	Laboratory Applicability	Duration	Date Issued	Prepared by:	Applicable to:
LB-000016	ISO 10312	Permanent modifications and clarifications to the Transmission Electron Microscopy analysis of air samples using ISO 10312	All	Permanent	12/2/02	J. Orr/Reservoirs	All data reports
LB-000017	TEM AHERA	Permanent modifications and clarifications to the Transmission Electron Microscopy analysis of air sample using AHERA	All	Permanent	12/2/02	J. Orr/Reservoirs	All data reports
LB-000018	PLM	PLM analysis performed by EPA 600/R-93/116 rather than NIOSH 9002	All	Permanent	12/3/2002	K. Corbin/ Hygeia	Hygeia reports: 22887020057 and 2287020664
LB-000019	All TEM methodologies	Clarification of bench sheet recording format for grid openings in which no countable structures are recorded.	EMSL	Permanent	1/21/2003	R. Mahoney/ EMSL	All data reports
LB-000020	EPA/600/R-94/134 (TEM Water Method 100.2)	Clarification of the data enumeration, recording, and reporting formats for EPA/600/R-94/134 (TEM Water Method 100.2) as they relate to the EPA Region 8 Libby, MT project	All	Permanent	3/12/2003	R. Mahoney/ EMSL	All data reports
LB-000021	TEM EPA 600	Gravimetric reductions (ashing and acid washing procedures) were not performed on 20 soil samples submitted by COC #D0049 & D0050 (Hygeia Job No. 22887030001), and COC #D0074 (Hygeia Job No. 22887030005)	All	Temporary: 1/2/03-1/10/03 and 1/22/03-1/24/03	1/29/2003	K. Corbin/ Hygeia	Hygeia reports: 22887030001 and 22887030005
LB-000022	SRC-LIBBY-03 Rev. 0	Use of only 0.2% and 1.2% Libby amphibole bulk standards in tan soil for quantification comparison in conjunction with SOP SRC-Libby-03 Rev. 0.	All	Temporary: From 16 December 2002 until bulk and permanent mount prepared slides of 0.2% and 1.0% Libby amphibole in both brown and tan soils are supplied to the involved laboratories by USGS, Denver.	3/11/2003	R. Mahoney/ EMSL	All data reports
LB-000023	TEM-AHERA, TEM-ISO 10312	Hygeia recorded all "ND" data as "NSD" for TEM-AHERA and TEM-ISO 10312 air sample analyses.	All	Temporary: 6/1/02 to 11/30/02	1/14/2003	K. Corbin/ Hygeia	22887020002 to 22887020063 excluding PLM and PCM data batch

**Requests for Modification
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Modification No.	Method	Description of Modification	Laboratory Applicability	Duration	Date Issued	Prepared by:	Applicable to:
LB-000024	PLM-NIOSH 9002	In addition to the traditional asbestos minerals, those comprising the Libby Amphibole complex will also be considered applicable analytes. Samples of 0.2 % and 1.2 % by weight Libby amphibole bulk reference materials in tan soil, prepared by the USGS, Denver, are used as comparison materials for quantification. Results will be categorized into four bins: "A" None Detected, "B1" asbestos detected but determined to be < or = 0.2%, "B2" asbestos detected but determined to be > 0.2% and < or = 1.0 %, and "C" > 1.0 %. Results will be reported as "A" - None Detected, "B1" - Trace, "B2" - < 1.0 %, and "C" - will be reported as a whole number percent.	All	Permanent	13-Mar-03	R. Mahoney/ EMSL	
LB-000025	PCM-NIOSH 7400	For a very limited number of samples, extremely long fibers that crossed the graticle periphery twice were included in the structure enumeration.	EMSL-Libby, MT	17 Sept. 2002 to 2 May 2003	13-May-03	R. Mahoney/ EMSL	< 20 samples (estimated)
LB-000026	EPA/600/R-94/134 (TEM Water Method 100.2)	Only asbestos structures (including Libby Amphiboles) > 10 µm in length and 3:1 aspect ratio were counted. These samples were analyzed prior to the LB-000020.	EMSL	15-Aug-01	4-Jun-03	R. Mahoney/ EMSL	040113160 (EPA sample numbers 1R-05337, 1R-05339, 1R-06024, 1R-06026, and 1R-06027)
LB-000027	TEM Water EPA/600/R-94/134	Clarification of the data enumeration, recording, and reporting formats for EPA/600/R-94/134 (TEM Water Method 100.2) as they relate to the to this project.	RESI	December 1999 through April 10, 2000	28-May-03	J. Orr/Reservoirs	Regarding RES Job #68278 (Samples 1-01224, 1-01225, and 1-01226)
LB-000028	All TEM Methodologies	Clarification to provide more complete TEM re-analysis data such as when some of the originally read grid openings in a sample selected for re-analysis have become unreadable.	All	Permanent	17-Jun-03	R. Mahoney/ EMSL	All TEM samples

**Requests for Modification
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Modification No.	Method	Description of Modification	Laboratory Applicability	Duration	Date Issued	Prepared by:	Applicable to:
LB-000029	TEM-AHERA TEM-ISO 10312 EPA/600/R-94/134	Permanent clarifications of laboratory-based Quality Control (QC) sample analysis. The purpose is to standardize the frequency of analysis and procedures for interpretation of the results for laboratory-based QC samples for TEM analyses (all media).	All	Permanent	16-Jul-03	W.J. Brattin/ Syracuse Research Corporation	All TEM QC samples
LB-000030	TEM-AHERA TEM-ISO 10312 ASTM D5755-96 EPA/600/R-94/134 (EPA 100.2)	All samples analyzed by TEM shall include sketches of all asbestos structures observed, up to a maximum of 50 structures in a sample. These sketches need not be highly detailed, but should include an indication of structure appearance, morphology, and orientation relative to any nearby landmarks, if present.	All	Permanent	5-Aug-03	W.J. Brattin/ Syracuse Research Corporation	All TEM samples



Request for Modification
To
Laboratory Activities
LB-000001

Instructions to Requester: E-mail form to contacts at bottom of form for review and approval.

File approved copy with Data Manager (CDM). Data Manager distributes approved forms as follows:

All Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, All project labs

Individual Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, Initiating Lab

Method (circle one/those applicable): TEM-AHERA, TEM-ISO 10312, PCM-NIOSH 7400, PLM-NIOSH 9002,
EPA/600/R-93/116, ASTM D5755-95, EPA/540/2-90/005a, Other: _____

Requester: Jeanne Spencer Orr

Title: President

Company: Reservoirs Environmental, Inc.

Date: 10/29/02

Description of Modification:

Original data recorded using historical laboratory nomenclature at RESI. Data Sheets updated to ISO 10312 Nomenclature and empty fields were filled in and data was entered into the Excel Spreadsheet.

Reason for Modification:

To document that previously submitted data sheets were revised to reflect use of consistent nomenclature across labs and current data reporting requirements.

Potential Implications of this Modification:

Allows data to be consistent with current data reporting.

Laboratory Applicability (circle one): All Individual(s) Reservoirs Environmental Services, Inc.

Duration of Modification (circle one):

Temporary

Date(s): All associated with RES 67867

Analytical Batch ID: 81 Air Samples 1-00001 through 1-00564

Temporary Modification Forms – Attach legible copies of approved form w/ all associated raw data packages

Permanent (complete Proposed Modification Section)

Permanent Modification Forms – Maintain legible copies of approved form in a binder that can be accessed by analysts.

Proposed Modification to Method (attach additional sheets if necessary; state section and page numbers of Method when applicable):

Technical Review: [Signature]
(Laboratory Manager or designate)

Date: 4/10/03

Project Review and Approval: [Signature]
(Volpe: Project Technical Lead or designate)

Date: 4/10/03
















Approved By: [Signature]
(USEPA: Project Chemist or designate)

Title: Project Chemist

Date: 4/10/03

Raney, Mark

From: Goldade.Mary@epamail.epa.gov
Sent: Thursday, April 10, 2003 4:10 PM
To: Raney, Mark
Cc: Autio, Anni; 'Beckham, Richard'; 'Orr, Jeaane at Reservoir Env'; 'mgoldade@peakpeak.com';
Raney, Mark
Subject: EPA Approved: MODs 1-14

        
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EPA approves all MODs 1-14 as modified by Mark Raney on 4-10-03.
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"Raney, Mark"

<RANEY@VOLPE.DOT.
Richard' <BeckhamRE@cdm.com>, "Raney, Mark"
GOV>
Mary Goldade/EPR/R8/USEPA/US@EPA, "'mgoldade@peakpeak.com'"
<mgoldade@peakpeak.com>
04/10/03 08:05 AM cc: "Autio, Anni"
<AutioAH@cdm.com>, "'Orr, Jeaane at Reservoir Env'"
<jeanneorr@resienv.com>
Subject: RE: MODs 1-14

All 14 of these MODs (MODs 1- 14) have not been revised to reflect Mary and my comments from March 13. In those emails we identified that:

1. The date needed to be corrected (i.e., says 10/29/03 not 10/29/02)
2. The "Reason for Modification" section had not been completed.

I have made the following changes to attached/revised MODs to reflect the above points:

1. Date changed to "10/29/02"
2. The following text was added to the "Reason for Modification" section: "To document that previously submitted data sheets were revised to reflect use of consistent nomenclature across labs and current data reporting requirements."

Upon receiving Mary's approval to the attached changes RESI may accept

the changes/finalize, sign, and send hardcopies out for signature.
Let me know if there are any questions as to how to proceed.

Mark.

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-----Original Message-----

From: Beckham, Richard [mailto:BeckhamRE@cdm.com]
Sent: Monday, April 07, 2003 10:32 AM
To: 'RANEY@VOLPE.DOT.GOV'; 'Goldade.Mary@epamail.epa.gov'; 'mgoldade@peakpeak.com'
Cc: Autio, Anni
Subject: MODs 1-14

For your review and approval.

- Richard Beckham

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Request for Modification

To
Laboratory Activities
LB-000002

Instructions to Requester: E-mail form to contacts at bottom of form for review and approval.

File approved copy with Data Manager (CDM). Data Manager distributes approved forms as follows:

All Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, All project labs

Individual Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, Initiating Lab

Method (circle one/those applicable): TEM-AHERA, TEM-ISO 10312, PCM-NIOSH 7400, PLM-NIOSH 9002, EPA/600/R-93/116, ASTM D5755-95, EPA/540/2-90/005a, Other: _____

Requester: Jeanne Spencer Orr

Title: President

Company: Reservoirs Environmental, Inc.

Date: 10/29/02

Description of Modification:

Original data recorded using historical laboratory nomenclature at RESI. Data Sheets updated to ISO 10312 Nomenclature and empty fields were filled in and data was entered into the Excel Spreadsheet.

Reason for Modification:

To document that previously submitted data sheets were revised to reflect use of consistent nomenclature across labs and current data reporting requirements.

Potential Implications of this Modification:

Allows data to be consistent with current data reporting.

Laboratory Applicability (circle one): All Individual(s) Reservoirs Environmental Services, Inc.

Duration of Modification (circle one):

Temporary Date(s): All associated with RES 72240

Analytical Batch ID: Dust Samples 1-01781 through 1-01786 and 1-01791 1-01792, 1-01796, 1-01797 and 1-01799.

Temporary Modification Forms – Attach legible copies of approved form w/ all associated raw data packages

Permanent (complete Proposed Modification Section)

Permanent Modification Forms – Maintain legible copies of approved form in a binder that can be accessed by analysts.

Proposed Modification to Method (attach additional sheets if necessary; state section and page numbers of Method when applicable):

Technical Review: [Signature]
(Laboratory Manager or designate)

Date: 4/10/03

Project Review and Approval: [Signature]
(Volpe: Project Technical Lead or designate)
















Date: 4/10/03

Approved By: [Signature] Title: Project Chemist
(USEPA: Project Chemist or designate)

Date: 4/10/03

Raney, Mark

From: Goldade.Mary@epamail.epa.gov
Sent: Thursday, April 10, 2003 4:10 PM
To: Raney, Mark
Cc: Autio, Anni; 'Beckham, Richard'; 'Orr, Jeaane at Reservoir Env'; 'mgoldade@peakpeak.com';
Raney, Mark
Subject: EPA Approved: MODs 1-14

        
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EPA approves all MODs 1-14 as modified by Mark Raney on 4-10-03.
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"Raney, Mark"

<RANEY@VOLPE.DOT.GOV>
Richard'" <BeckhamRE@cdm.com>, "Raney, Mark"
GOV>
Mary Goldade/EPR/R8/USEPA/US@EPA, "'mgoldade@peakpeak.com'"
<mgoldade@peakpeak.com>
04/10/03 08:05 AM cc: "Autio, Anni"
<AutioAH@cdm.com>, "'Orr, Jeaane at Reservoir Env'"
<jeanneorr@resienv.com>
Subject: RE: MODs 1-14

All 14 of these MODs (MODs 1- 14) have not been revised to reflect Mary and my comments from March 13. In those emails we identified that:

1. The date needed to be corrected (i.e., says 10/29/03 not 10/29/02)
2. The "Reason for Modification" section had not been completed.

I have made the following changes to attached/revised MODs to reflect the above points:

1. Date changed to "10/29/02"
2. The following text was added to the "Reason for Modification" section: "To document that previously submitted data sheets were revised to reflect use of consistent nomenclature across labs and current data reporting requirements."

Upon receiving Mary's approval to the attached changes RESI may accept

the changes/finalize, sign, and send hardcopies out for signature.
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(MR 4-10-03 email).doc>> <<LB-000014 (MR 4-10-03 email).doc>>

-----Original Message-----

From: Beckham, Richard [mailto:BeckhamRE@cdm.com]
Sent: Monday, April 07, 2003 10:32 AM
To: 'RANEY@VOLPE.DOT.GOV'; 'Goldade.Mary@epamail.epa.gov';
'mgoldade@peakpeak.com'
Cc: Autio, Anni
Subject: MODs 1-14

For your review and approval.

- Richard Beckham

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(See attached file: LB-000013 (MR 4-10-03 email).doc)(See attached file:
LB-000014 (MR 4-10-03 email).doc)



Request for Modification
To
Laboratory Activities
LB-000003

Instructions to Requester: E-mail form to contacts at bottom of form for review and approval.
File approved copy with Data Manager (CDM). Data Manager distributes approved forms as follows:

All Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, All project labs

Individual Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, Initiating Lab

Method (circle one/those applicable): TEM-AHERA, TEM-ISO 10312, PCM-NIOSH 7400, PLM-NIOSH 9002,
EPA/600/R-93/116, ASTM D5755-95, EPA/540/2-90/005a, Other: _____

Requester: Jeanne Spencer Orr

Title: President

Company: Reservoirs Environmental, Inc.

Date: 10/29/02

Description of Modification:

Original data recorded using historical laboratory nomenclature at RESI. Data Sheets updated to ISO 10312
Nomenclature and empty fields were filled in and data was entered into the Excel Spreadsheet.

Reason for Modification:

To document that previously submitted data sheets were revised to reflect use of consistent nomenclature
across labs and current data reporting requirements.

Potential Implications of this Modification:

Allows data to be consistent with current data reporting.

Laboratory Applicability (circle one): All Individual(s) RESI

Duration of Modification (circle one):

Temporary

Date(s): All associated with RES 72242

Analytical Batch ID: Air samples 1-01741 through 1-01767

Temporary Modification Forms – Attach legible copies of approved form w/ all associated raw data packages

Permanent (complete Proposed Modification Section)

Permanent Modification Forms – Maintain legible copies of approved form in a binder that can be accessed by analysts.

Proposed Modification to Method (attach additional sheets if necessary; state section and page numbers of Method when applicable):

Technical Review: Jeanne Spencer Orr
(Laboratory Manager or designate)

Date: 4/10/03

Project Review and Approval: Mark R. [Signature]
(Volpe: Project Technical Lead or designate)

Date: 4/10/03

Approved By: Jane [Signature]
(USEPA: Project Chemist or designate)

Title: Project Chemist

Date: 4/10/03

Raney, Mark

From: Goldade.Mary@epamail.epa.gov
Sent: Thursday, April 10, 2003 4:10 PM
To: Raney, Mark
Cc: Autio, Anni; 'Beckham, Richard'; 'Orr, Jeaane at Reservoir Env'; 'mgoldade@peakpeak.com';
Raney, Mark
Subject: EPA Approved: MODs 1-14



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EPA approves all MODs 1-14 as modified by Mark Raney on 4-10-03.
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"Raney, Mark"

<RANEY@VOLPE.DOT.GOV> To: "'Beckham,
Richard'" <BeckhamRE@cdm.com>, "Raney, Mark"
GOV> <RANEY@VOLPE.DOT.GOV>,
Mary Goldade/EPR/R8/USEPA/US@EPA, "'mgoldade@peakpeak.com'"
<mgoldade@peakpeak.com>
04/10/03 08:05 AM cc: "Autio, Anni"
<AutioAH@cdm.com>, "'Orr, Jeaane at Reservoir Env'"
<jeanneorr@resienv.com>
Subject: RE: MODs 1-14

All 14 of these MODs (MODs 1- 14) have not been revised to reflect Mary and my comments from March 13. In those emails we identified that:

1. The date needed to be corrected (i.e., says 10/29/03 not 10/29/02)
2. The "Reason for Modification" section had not been completed.

I have made the following changes to attached/revised MODs to reflect the above points:

1. Date changed to "10/29/02"
2. The following text was added to the "Reason for Modification" section: "To document that previously submitted data sheets were used to reflect use of consistent nomenclature across labs and current data reporting requirements."

Upon receiving Mary's approval to the attached changes RESI may accept

the changes/finalize, sign, and send hardcopies out for signature.
Let me know if there are any questions as to how to proceed.

Mark.

<<LB-000001 (MR 4-10-03 email).doc>> <<LB-000002 (MR 4-10-03 email).doc>> <<LB-000003 (MR 4-10-03 email).doc>> <<LB-000004 (MR 4-10-03 email).doc>> <<LB-000005 (MR 4-10-03 email).doc>> <<LB-000006 (MR 4-10-03 email).doc>> <<LB-000007 (MR 4-10-03 email).doc>> <<LB-000008 (MR 4-10-03 email).doc>> <<LB-000009 (MR 4-10-03 email).doc>> <<LB-000010 (Mr 4-10-03 email).doc>> <<LB-000011 (MR 4-10-03 email).doc>> <<LB-000012 (MR 4-10-03 email).doc>> <<LB-000013 (MR 4-10-03 email).doc>> <<LB-000014 (MR 4-10-03 email).doc>>

-----Original Message-----

From: Beckham, Richard [mailto:BeckhamRE@cdm.com]
Sent: Monday, April 07, 2003 10:32 AM
To: 'RANEY@VOLPE.DOT.GOV'; 'Goldade.Mary@epamail.epa.gov';
'mgoldade@peakpeak.com'
Cc: Autio, Anni
Subject: MODs 1-14

For your review and approval.

- Richard Beckham

<<LB-000001.doc>> <<LB-000002.doc>> <<LB-000003.doc>>
<<LB-000004.doc>> <<LB-000005.doc>> <<LB-000006.doc>> <<LB-000007.doc>>
<<LB-000008.doc>> <<LB-000009.doc>> <<LB-000010.doc>> <<LB-000011.doc>>
<<LB-000012.doc>> <<LB-000013.doc>> <<LB-000014.doc>> << File: LB-000001.doc >> <<
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LB-000004.doc >> << File: LB-000005.doc >> << File: LB-000006.doc >>
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(See attached file: LB-000013 (MR 4-10-03 email).doc)(See attached file:
LB-000014 (MR 4-10-03 email).doc)



Request for Modification
To
Laboratory Activities
LB-000004

Instructions to Requester: E-mail form to contacts at bottom of form for review and approval.

File approved copy with Data Manager (CDM). Data Manager distributes approved forms as follows:

All Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, All project labs

Individual Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, Initiating Lab

Method (circle one/those applicable): TEM-AHERA, TEM-ISO 10312, PCM-NIOSH 7400, PLM-NIOSH 9002,
EPA/600/R-93/116, ASTM D5755-95, EPA/540/2-90/005a, Other: _____

Requester: Jeanne Spencer Orr

Title: President

Company: Reservoirs Environmental, Inc.

Date: 10/29/02

Description of Modification:

Original data recorded using historical laboratory nomenclature at RESI. Data Sheets updated to ISO 10312
Nomenclature and empty fields were filled in and data was entered into the Excel Spreadsheet.

Reason for Modification:

To document that previously submitted data sheets were revised to reflect use of consistent nomenclature
across labs and current data reporting requirements.

Potential Implications of this Modification:

Allows data to be consistent with current data reporting.

Laboratory Applicability (circle one): All Individual(s) RESI

Duration of Modification (circle one):

Temporary

Date(s): All associated with RES 74033

Analytical Batch ID: Air samples 1R-04208, 1R-04217, 1R-04230 and 1R-04231

Temporary Modification Forms – Attach legible copies of approved form w/ all associated raw data packages

Permanent (complete Proposed Modification Section)

Permanent Modification Forms – Maintain legible copies of approved form in a binder that can be accessed by analysts.

Proposed Modification to Method (attach additional sheets if necessary; state section and page numbers of Method when applicable):

Technical Review: [Signature]
(Laboratory Manager or designate)

Date: 4/10/03

Project Review and Approval: [Signature]
(Volpe: Project Technical Lead or designate)

Date: 4/10/03

Approved By: [Signature]
(USEPA: Project Chemist or designate)

Title: Project Chemist

Date: 4/10/03

Raney, Mark

From: Goldade.Mary@epamail.epa.gov
Sent: Thursday, April 10, 2003 4:10 PM
To: Raney, Mark
Cc: Autio, Anni; 'Beckham, Richard'; 'Orr, Jeaane at Reservoir Env'; 'mgoldade@peakpeak.com';
Raney, Mark
Subject: EPA Approved: MODs 1-14



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EPA approves all MODs 1-14 as modified by Mark Raney on 4-10-03.
(Embedded image moved to file: pic15881.gif)

"Raney, Mark"

<RANEY@VOLPE.DOT.
Richard" <BeckhamRE@cdm.com>, "Raney, Mark"
GOV>
Mary Goldade/EPR/R8/USEPA/US@EPA, "'mgoldade@peakpeak.com'"
<mgoldade@peakpeak.com>
04/10/03 08:05 AM cc: "Autio, Anni"
<AutioAH@cdm.com>, "'Orr, Jeaane at Reservoir Env'"
<jeanneorr@resienv.com>
Subject: RE: MODs 1-14

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1. The date needed to be corrected (i.e., says 10/29/03 not 10/29/02)
2. The "Reason for Modification" section had not been completed.

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1. Date changed to "10/29/02"
2. The following text was added to the "Reason for Modification" section: "To document that previously submitted data sheets were revised to reflect use of consistent nomenclature across labs and current data reporting requirements."

Upon receiving Mary's approval to the attached changes RESI may accept

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Let me know if there are any questions as to how to proceed.

Mark.

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-----Original Message-----

From: Beckham, Richard [mailto:BeckhamRE@cdm.com]
Sent: Monday, April 07, 2003 10:32 AM
To: 'RANEY@VOLPE.DOT.GOV'; 'Goldade.Mary@epamail.epa.gov';
'mgoldade@peakpeak.com'
Cc: Autio, Anni
Subject: MODs 1-14

For your review and approval.

- Richard Beckham

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LB-000014 (MR 4-10-03 email).doc)



Request for Modification

To

Laboratory Activities

LB-000005

Instructions to Requester: E-mail form to contacts at bottom of form for review and approval.

File approved copy with Data Manager (CDM). Data Manager distributes approved forms as follows:

All Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, All project labs

Individual Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, Initiating Lab

Method (circle one/those applicable): TEM-AHERA, TEM-ISO 10312, PCM-NIOSH 7400, PLM-NIOSH 9002, EPA/600/R-93/116, ASTM D5755-95, EPA/540/2-90/005a, Other: _____

Requester: Jeanne Spencer Orr

Title: President

Company: Reservoirs Environmental, Inc.

Date: 10/29/02

Description of Modification:

Original data recorded using historical laboratory nomenclature at RESI. Data Sheets updated to ISO 10312 Nomenclature and empty fields were filled in and data was entered into the Excel Spreadsheet.

Reason for Modification:

To document that previously submitted data sheets were revised to reflect use of consistent nomenclature across labs and current data reporting requirements.

Potential Implications of this Modification:

Allows data to be consistent with current data reporting.

Laboratory Applicability (circle one): All Individual(s) RESI

Duration of Modification (circle one):

Temporary

Date(s): All associated with RES 74035

Analytical Batch ID: Air samples 1R-04060, 1R-04051, 1R-04052

Temporary Modification Forms – Attach legible copies of approved form w/ all associated raw data packages

Permanent (complete Proposed Modification Section)

Permanent Modification Forms – Maintain legible copies of approved form in a binder that can be accessed by analysts.

Proposed Modification to Method (attach additional sheets if necessary; state section and page numbers of Method when applicable):

Technical Review: [Signature]

(Laboratory Manager or designate)

Date: 4/10/03

Project Review and Approval: [Signature]

(Volpe: Project Technical Lead or designate)

Date: 4/10/03

Approved By: [Signature]

(USEPA: Project Chemist or designate)

Title: Project Chemist

Date: 4/10/03

Raney, Mark

From: Goldade.Mary@epamail.epa.gov
Sent: Thursday, April 10, 2003 4:10 PM
To: Raney, Mark
Cc: Autio, Anni; 'Beckham, Richard'; 'Orr, Jeaane at Reservoir Env'; 'mgoldade@peakpeak.com';
Raney, Mark
Subject: EPA Approved: MODs 1-14



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EPA approves all MODs 1-14 as modified by Mark Raney on 4-10-03.
(Embedded image moved to file: pic15881.gif)

"Raney, Mark"

<RANEY@VOLPE.DOT.
Richard' <BeckhamRE@cdm.com>, "Raney, Mark"
GOV>
Mary Goldade/EPR/R8/USEPA/US@EPA, "'mgoldade@peakpeak.com'"
<mgoldade@peakpeak.com>
04/10/03 08:05 AM cc: "Autio, Anni"
<AutioAH@cdm.com>, "'Orr, Jeaane at Reservoir Env'"
<jeanneorr@resienv.com>
Subject: RE: MODs 1-14

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1. The date needed to be corrected (i.e., says 10/29/03 not 10/29/02)
2. The "Reason for Modification" section had not been completed.

I have made the following changes to attached/revised MODs to reflect the above points:

1. Date changed to "10/29/02"
2. The following text was added to the "Reason for Modification" section: "To document that previously submitted data sheets were revised to reflect use of consistent nomenclature across labs and current data reporting requirements."

Upon receiving Mary's approval to the attached changes RESI may accept

the changes/finalize, sign, and send hardcopies out for signature.
Let me know if there are any questions as to how to proceed.

Mark.

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-----Original Message-----

From: Beckham, Richard [mailto:BeckhamRE@cdm.com]
Sent: Monday, April 07, 2003 10:32 AM
To: 'RANEY@VOLPE.DOT.GOV'; 'Goldade.Mary@epamail.epa.gov'; 'mgoldade@peakpeak.com'
Cc: Autio, Anni
Subject: MODs 1-14

For your review and approval.

- Richard Beckham

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Request for Modification
To
Laboratory Activities
LB-000006

Instructions to Requester: E-mail form to contacts at bottom of form for review and approval.

File approved copy with Data Manager (CDM). Data Manager distributes approved forms as follows:

All Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, All project labs

Individual Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, Initiating Lab

Method (circle one/those applicable): TEM-AHERA, TEM-ISO 10312, PCM-NIOSH 7400, PLM-NIOSH 9002,
EPA/600/R-93/116, ASTM D5755-95, EPA/540/2-90/005a, Other: _____

Requester: Jeanne Spencer Orr

Title: President

Company: Reservoirs Environmental, Inc.

Date: 10/29/02

Description of Modification:

Original data recorded using historical laboratory nomenclature at RESI. Data Sheets updated to ISO 10312 Nomenclature and empty fields were filled in and data was entered into the Excel Spreadsheet.

Reason for Modification:

To document that previously submitted data sheets were revised to reflect use of consistent nomenclature across labs and current data reporting requirements.

Potential Implications of this Modification:

Allows data to be consistent with current data reporting.

Laboratory Applicability (circle one): All Individual(s) Reservoirs Environmental Services, Inc.

Duration of Modification (circle one):

Temporary

Date(s): All associated with RES 74036

Analytical Batch ID: Air Samples 1R-04091, 1R-04094, 1R-04100 and 1R-04101

Temporary Modification Forms – Attach legible copies of approved form w/ all associated raw data packages

Permanent (complete Proposed Modification Section)

Permanent Modification Forms – Maintain legible copies of approved form in a binder that can be accessed by analysts.

Proposed Modification to Method (attach additional sheets if necessary; state section and page numbers of Method when applicable):

Technical Review: [Signature]
(Laboratory Manager or designate)

Date: 4/10/03

Project Review and Approval: [Signature]
(Volpe: Project Technical Lead or designate)

Date: 4/10/03

Approved By: Jane Goldade
(USEPA: Project Chemist or designate)

Title: Project Chemist

Date: 4/10/03

Raney, Mark

From: Goldade.Mary@epamail.epa.gov
Sent: Thursday, April 10, 2003 4:10 PM
To: Raney, Mark
Cc: Autio, Anni; 'Beckham, Richard'; 'Orr, Jeaane at Reservoir Env'; 'mgoldade@peakpeak.com';
Raney, Mark
Subject: EPA Approved: MODs 1-14



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EPA approves all MODs 1-14 as modified by Mark Raney on 4-10-03.
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"Raney, Mark"

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Richard' <BeckhamRE@cdm.com>, "Raney, Mark"
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<mgoldade@peakpeak.com>
04/10/03 08:05 AM cc: "Autio, Anni"
<AutioAH@cdm.com>, "'Orr, Jeaane at Reservoir Env'"
<jeanneorr@resienv.com>
Subject: RE: MODs 1-14

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1. Date changed to "10/29/02"
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-----Original Message-----

From: Beckham, Richard [mailto:BeckhamRE@cdm.com]
Sent: Monday, April 07, 2003 10:32 AM
To: 'RANEY@VOLPE.DOT.GOV'; 'Goldade.Mary@epamail.epa.gov'; 'mgoldade@peakpeak.com'
Cc: Autio, Anni
Subject: MODs 1-14

For your review and approval.

- Richard Beckham

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(See attached file: LB-000013 (MR 4-10-03 email).doc)(See attached file:
LB-000014 (MR 4-10-03 email).doc)



Request for Modification
To
Laboratory Activities
LB-000007

Instructions to Requester: E-mail form to contacts at bottom of form for review and approval.

File approved copy with Data Manager (CDM). Data Manager distributes approved forms as follows:

All Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, All project labs

Individual Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, Initiating Lab

Method (circle one/those applicable): TEM-AHERA, TEM-ISO 10312, PCM-NIOSH 7400, PLM-NIOSH 9002,
EPA/600/R-93/116, ASTM D5755-95, EPA/540/2-90/005a, Other: _____

Requester: Jeanne Spencer Orr

Title: President

Company: Reservoirs Environmental, Inc.

Date: 10/29/02

Description of Modification:

Original data recorded using historical laboratory nomenclature at RESI. Data Sheets updated to ISO 10312 Nomenclature and empty fields were filled in and data was entered into the Excel Spreadsheet.

Reason for Modification:

To document that previously submitted data sheets were revised to reflect use of consistent nomenclature across labs and current data reporting requirements.

Potential Implications of this Modification:

Allows data to be consistent with current data reporting.

Laboratory Applicability (circle one): All Individual(s) RESI

Duration of Modification (circle one):

Temporary

Date(s): All associated with RES 74037

Analytical Batch ID: Air samples 1R-04122, 1R-04123, 1R-04132 and 1R-04133

Temporary Modification Forms – Attach legible copies of approved form w/ all associated raw data packages

Permanent (complete Proposed Modification Section)

Permanent Modification Forms – Maintain legible copies of approved form in a binder that can be accessed by analysts.

Proposed Modification to Method (attach additional sheets if necessary; state section and page numbers of Method when applicable):

Technical Review: [Signature]

(Laboratory Manager or designate)

Date: 4/10/03

Project Review and Approval: [Signature]

(Volpe: Project Technical Lead or designate)

Date: 4/10/03

Approved By: [Signature]

(USEPA: Project Chemist or designate)

Title: Project Chemist

Date: 4/10/03

Raney, Mark

From: Goldade.Mary@epamail.epa.gov
Sent: Thursday, April 10, 2003 4:10 PM
To: Raney, Mark
Cc: Autio, Anni; 'Beckham, Richard'; 'Orr, Jeaane at Reservoir Env'; 'mgoldade@peakpeak.com';
Raney, Mark
Subject: EPA Approved: MODs 1-14



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-10-03 email).d.-10-03 email).d.-10-03 email).d.-10-03 email).d.-10-03 email).d.-10-03 email).d..

EPA approves all MODs 1-14 as modified by Mark Raney on 4-10-03.
(Embedded image moved to file: pic15881.gif)

"Raney, Mark"

<RANEY@VOLPE.DOT.
Richard'" <BeckhamRE@cdm.com>, "Raney, Mark"
GOV>
y Goldade/EPR/R8/USEPA/US@EPA, "'mgoldade@peakpeak.com'"
<mgoldade@peakpeak.com>
04/10/03 08:05 AM cc: "Autio, Anni"
<AutioAH@cdm.com>, "'Orr, Jeaane at Reservoir Env'"
<jeanneorr@resienv.com>
Subject: RE: MODs 1-14

All 14 of these MODs (MODs 1- 14) have not been revised to reflect Mary and my comments from March 13. In those emails we identified that:

1. The date needed to be corrected (i.e., says 10/29/03 not 10/29/02)
2. The "Reason for Modification" section had not been completed.

I have made the following changes to attached/revised MODs to reflect the above points:

1. Date changed to "10/29/02"
2. The following text was added to the "Reason for Modification" section: "To document that previously submitted data sheets were used to reflect use of consistent nomenclature across labs and current data reporting requirements."

Upon receiving Mary's approval to the attached changes RESI may accept

the changes/finalize, sign, and send hardcopies out for signature.
Let me know if there are any questions as to how to proceed.

Mark.

<<LB-000001 (MR 4-10-03 email).doc>> <<LB-000002 (MR 4-10-03 email).doc>> <<LB-000003 (MR 4-10-03 email).doc>> <<LB-000004 (MR 4-10-03 email).doc>> <<LB-000005 (MR 4-10-03 email).doc>> <<LB-000006 (MR 4-10-03 email).doc>> <<LB-000007 (MR 4-10-03 email).doc>> <<LB-000008 (MR 4-10-03 email).doc>> <<LB-000009 (MR 4-10-03 email).doc>> <<LB-000010 (Mr 4-10-03 email).doc>> <<LB-000011 (MR 4-10-03 email).doc>> <<LB-000012 (MR 4-10-03 email).doc>> <<LB-000013 (MR 4-10-03 email).doc>> <<LB-000014 (MR 4-10-03 email).doc>>

-----Original Message-----

From: Beckham, Richard [mailto:BeckhamRE@cdm.com]
Sent: Monday, April 07, 2003 10:32 AM
To: 'RANEY@VOLPE.DOT.GOV'; 'Goldade.Mary@epamail.epa.gov'; 'mgoldade@peakpeak.com'
Cc: Autio, Anni
Subject: MODs 1-14

For your review and approval.

- Richard Beckham

<<LB-000001.doc>> <<LB-000002.doc>> <<LB-000003.doc>>
<<LB-000004.doc>> <<LB-000005.doc>> <<LB-000006.doc>> <<LB-000007.doc>>
<<LB-000008.doc>> <<LB-000009.doc>> <<LB-000010.doc>> <<LB-000011.doc>>
<<LB-000012.doc>> <<LB-000013.doc>> <<LB-000014.doc>> << File: LB-000001.doc >> << File: LB-000002.doc >> << File: LB-000003.doc >> << File: LB-000004.doc >> << File: LB-000005.doc >> << File: LB-000006.doc >> << File: LB-000007.doc >> << File: LB-000008.doc >> << File: LB-000009.doc >> << File: LB-000010.doc >> << File: LB-000011.doc >> << File: LB-000012.doc >> << File: LB-000013.doc >> << File: LB-000014.doc >>
(See attached file: LB-000001 (MR 4-10-03 email).doc)(See attached file: LB-000002 (MR 4-10-03 email).doc)(See attached file: LB-000003 (MR 4-10-03 email).doc)(See attached file: LB-000004 (MR 4-10-03 email).doc)(See attached file: LB-000005 (MR 4-10-03 email).doc)(See attached file: LB-000006 (MR 4-10-03 email).doc)(See attached file: LB-000007 (MR 4-10-03 email).doc)(See attached file: LB-000008 (MR 4-10-03 email).doc)(See attached file: LB-000009 (MR 4-10-03 email).doc)(See attached file: LB-000010 (MR 4-10-03 email).doc)(See attached file: LB-000011 (MR 4-10-03 email).doc)(See attached file: LB-000012 (MR 4-10-03 email).doc)(See attached file: LB-000013 (MR 4-10-03 email).doc)(See attached file: LB-000014 (MR 4-10-03 email).doc)



Request for Modification

To
Laboratory Activities
LB-000008

Instructions to Requester: E-mail form to contacts at bottom of form for review and approval.

File approved copy with Data Manager (CDM). Data Manager distributes approved forms as follows:

All Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, All project labs

Individual Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, Initiating Lab

Method (circle one/those applicable): TEM-AHERA, TEM-ISO 10312, PCM-NIOSH 7400, PLM-NIOSH 9002,
EPA/600/R-93/116, ASTM D5755-95, EPA/540/2-90/005a, Other: _____

Requester: Jeanne Spencer Orr

Title: President

Company: Reservoirs Environmental, Inc.

Date: 10/29/02

Description of Modification:

Original data recorded using historical laboratory nomenclature at RESI. Data Sheets updated to ISO 10312 Nomenclature and empty fields were filled in and data was entered into the Excel Spreadsheet.

Reason for Modification:

To document that previously submitted data sheets were revised to reflect use of consistent nomenclature across labs and current data reporting requirements.

Potential Implications of this Modification:

Allows data to be consistent with current data reporting.

Laboratory Applicability (circle one): All Individual(s) RESI

Duration of Modification (circle one):

Temporary

Date(s): All associated with RES 74038

Analytical Batch ID: Air samples 1R-04183, 1R-04192, 1R-04205 and 1R-04206

Temporary Modification Forms – Attach legible copies of approved form w/ all associated raw data packages

Permanent (complete Proposed Modification Section)

Permanent Modification Forms – Maintain legible copies of approved form in a binder that can be accessed by analysts.

Proposed Modification to Method (attach additional sheets if necessary; state section and page numbers of Method when applicable):

Technical Review: Jeanne Orr
(Laboratory Manager or designate)

Date: 4/10/03

Project Review and Approval: Mark R.
(Volpe: Project Technical Lead or designate)

Date: 2/10/03

Approved By: John Goldade
(USEPA: Project Chemist or designate)

Title: Project Chemist

Date: 4/10/03

Raney, Mark

From: Goldade.Mary@epamail.epa.gov
Sent: Thursday, April 10, 2003 4:10 PM
To: Raney, Mark
Cc: Autio, Anni; 'Beckham, Richard'; 'Orr, Jeaane at Reservoir Env'; 'mgoldade@peakpeak.com';
Raney, Mark
Subject: EPA Approved: MODs 1-14



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-10-03 email).d.-10-03 email).d.-10-03 email).d.-10-03 email).d.-10-03 email).d.-10-03 email).d..

EPA approves all MODs 1-14 as modified by Mark Raney on 4-10-03.
(Embedded image moved to file: pic15881.gif)

"Raney, Mark"

<RANEY@VOLPE.DOT.
Richard' <BeckhamRE@cdm.com>, "Raney, Mark"
GOV>
y Goldade/EPR/R8/USEPA/US@EPA, "'mgoldade@peakpeak.com'"
<RANEY@VOLPE.DOT.GOV>,
<mgoldade@peakpeak.com>
04/10/03 08:05 AM cc: "Autio, Anni"
<AutioAH@cdm.com>, "'Orr, Jeaane at Reservoir Env'"
<jeanneorr@resienv.com>
Subject: RE: MODs 1-14

All 14 of these MODs (MODs 1- 14) have not been revised to reflect Mary and my comments from March 13. In those emails we identified that:

1. The date needed to be corrected (i.e., says 10/29/03 not 10/29/02)
2. The "Reason for Modification" section had not been completed.

I have made the following changes to attached/revised MODs to reflect the above points:

1. Date changed to "10/29/02"
2. The following text was added to the "Reason for Modification" section: "To document that previously submitted data sheets were revised to reflect use of consistent nomenclature across labs and current data reporting requirements."

Upon receiving Mary's approval to the attached changes RESI may accept

the changes/finalize, sign, and send hardcopies out for signature.
Let me know if there are any questions as to how to proceed.

Mark.

<<LB-000001 (MR 4-10-03 email).doc>> <<LB-000002 (MR 4-10-03
email).doc>> <<LB-000003 (MR 4-10-03 email).doc>> <<LB-000004 (MR
4-10-03 email).doc>> <<LB-000005 (MR 4-10-03 email).doc>> <<LB-000006
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4-10-03 email).doc>> <<LB-000012 (MR 4-10-03 email).doc>> <<LB-000013
(MR 4-10-03 email).doc>> <<LB-000014 (MR 4-10-03 email).doc>>

-----Original Message-----

From: Beckham, Richard [mailto:BeckhamRE@cdm.com]
Sent: Monday, April 07, 2003 10:32 AM
To: 'RANEY@VOLPE.DOT.GOV'; 'Goldade.Mary@epamail.epa.gov';
'mgoldade@peakpeak.com'
Cc: Autio, Anni
Subject: MODs 1-14

For your review and approval.

- Richard Beckham

<<LB-000001.doc>> <<LB-000002.doc>> <<LB-000003.doc>>
<<LB-000004.doc>> <<LB-000005.doc>> <<LB-000006.doc>> <<LB-000007.doc>>
<<LB-000008.doc>> <<LB-000009.doc>> <<LB-000010.doc>> <<LB-000011.doc>>
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LB-000004.doc >> << File: LB-000005.doc >> << File: LB-000006.doc >>
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LB-000009.doc >> << File: LB-000010.doc >> << File: LB-000011.doc >>
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LB-000014.doc >>
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LB-000002 (MR 4-10-03 email).doc)(See attached file: LB-000003 (MR
4-10-03 email).doc)(See attached file: LB-000004 (MR 4-10-03 email).doc)
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LB-000010 (Mr 4-10-03 email).doc)(See attached file: LB-000011 (MR
4-10-03 email).doc)(See attached file: LB-000012 (MR 4-10-03 email).doc)
(See attached file: LB-000013 (MR 4-10-03 email).doc)(See attached file:
LB-000014 (MR 4-10-03 email).doc)



Request for Modification

To
Laboratory Activities
LB-000009

Instructions to Requester: E-mail form to contacts at bottom of form for review and approval.

File approved copy with Data Manager (CDM). Data Manager distributes approved forms as follows:

All Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, All project labs

Individual Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, Initiating Lab

Method (circle one/those applicable): TEM-AHERA, TEM-ISO 10312, PCM-NIOSH 7400, PLM-NIOSH 9002,
EPA/600/R-93/116, ASTM D5755-95, EPA/540/2-90/005a, Other: _____

Requester: Jeanne Spencer Orr

Title: President

Company: Reservoirs Environmental, Inc.

Date: 10/29/02

Description of Modification:

Original data recorded using historical laboratory nomenclature at RESI. Data Sheets updated to ISO 10312 Nomenclature and empty fields were filled in and data was entered into the Excel Spreadsheet.

Reason for Modification:

To document that previously submitted data sheets were revised to reflect use of consistent nomenclature across labs and current data reporting requirements.

Potential Implications of this Modification:

Allows data to be consistent with current data reporting.

Laboratory Applicability (circle one): All Individual(s) RESI

Duration of Modification (circle one):

Temporary

Date(s): All associated with RES 74157

Analytical Batch ID: Dust samples 1-01911 through 1-01915

Temporary Modification Forms – Attach legible copies of approved form w/ all associated raw data packages

Permanent (complete Proposed Modification Section)

Permanent Modification Forms – Maintain legible copies of approved form in a binder that can be accessed by analysts.

Proposed Modification to Method (attach additional sheets if necessary; state section and page numbers of Method when applicable):

Technical Review: [Signature]
(Laboratory Manager or designate)

Date: 4/10/03

Project Review and Approval: [Signature]
(Volpe: Project Technical Lead or designate)

Date: 4/10/03

Approved By: [Signature]
(USEPA: Project Chemist or designate)

Title: Project Chemist

Date: 4/10/03

Raney, Mark

From: Goldade.Mary@epamail.epa.gov
Sent: Thursday, April 10, 2003 4:10 PM
To: Raney, Mark
Cc: Autio, Anni; 'Beckham, Richard'; 'Orr, Jeaane at Reservoir Env'; 'mgoldade@peakpeak.com';
Raney, Mark
Subject: EPA Approved: MODs 1-14



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EPA approves all MODs 1-14 as modified by Mark Raney on 4-10-03.
(Embedded image moved to file: pic15881.gif)

"Raney, Mark"

<RANEY@VOLPE.DOT.
Richard' <BeckhamRE@cdm.com>, "Raney, Mark"
GOV>
Mary Goldade/EPR/R8/USEPA/US@EPA, "'mgoldade@peakpeak.com'"
<RANEY@VOLPE.DOT.GOV>,
<mgoldade@peakpeak.com>
04/10/03 08:05 AM cc: "Autio, Anni"
<AutioAH@cdm.com>, "'Orr, Jeaane at Reservoir Env'"
<jeanneorr@resienv.com>
Subject: RE: MODs 1-14

All 14 of these MODs (MODs 1- 14) have not been revised to reflect Mary and my comments from March 13. In those emails we identified that:

1. The date needed to be corrected (i.e., says 10/29/03 not 10/29/02)
2. The "Reason for Modification" section had not been completed.

I have made the following changes to attached/revised MODs to reflect the above points:

1. Date changed to "10/29/02"
2. The following text was added to the "Reason for Modification" section: "To document that previously submitted data sheets were revised to reflect use of consistent nomenclature across labs and current data reporting requirements."

Upon receiving Mary's approval to the attached changes RESI may accept

the changes/finalize, sign, and send hardcopies out for signature.
Let me know if there are any questions as to how to proceed.

Mark.

<<LB-000001 (MR 4-10-03 email).doc>> <<LB-000002 (MR 4-10-03 email).doc>> <<LB-000003 (MR 4-10-03 email).doc>> <<LB-000004 (MR 4-10-03 email).doc>> <<LB-000005 (MR 4-10-03 email).doc>> <<LB-000006 (MR 4-10-03 email).doc>> <<LB-000007 (MR 4-10-03 email).doc>> <<LB-000008 (MR 4-10-03 email).doc>> <<LB-000009 (MR 4-10-03 email).doc>> <<LB-000010 (Mr 4-10-03 email).doc>> <<LB-000011 (MR 4-10-03 email).doc>> <<LB-000012 (MR 4-10-03 email).doc>> <<LB-000013 (MR 4-10-03 email).doc>> <<LB-000014 (MR 4-10-03 email).doc>>

-----Original Message-----

From: Beckham, Richard [mailto:BeckhamRE@cdm.com]
Sent: Monday, April 07, 2003 10:32 AM
To: 'RANEY@VOLPE.DOT.GOV'; 'Goldade.Mary@epamail.epa.gov'; 'mgoldade@peakpeak.com'
Cc: Autio, Anni
Subject: MODs 1-14

For your review and approval.

- Richard Beckham

<<LB-000001.doc>> <<LB-000002.doc>> <<LB-000003.doc>>
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LB-000009.doc >> << File: LB-000010.doc >> << File: LB-000011.doc >>
<< File: LB-000012.doc >> << File: LB-000013.doc >> << File:
LB-000014.doc >>
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LB-000002 (MR 4-10-03 email).doc)(See attached file: LB-000003 (MR
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LB-000006 (MR 4-10-03 email).doc)(See attached file: LB-000007 (MR
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LB-000010 (Mr 4-10-03 email).doc)(See attached file: LB-000011 (MR
4-10-03 email).doc)(See attached file: LB-000012 (MR 4-10-03 email).doc)
(See attached file: LB-000013 (MR 4-10-03 email).doc)(See attached file:
LB-000014 (MR 4-10-03 email).doc)



Request for Modification

To
Laboratory Activities
LB-000010

Instructions to Requester: E-mail form to contacts at bottom of form for review and approval.

File approved copy with Data Manager (CDM). Data Manager distributes approved forms as follows:

All Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, All project labs

Individual Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, Initiating Lab

Method (circle one/those applicable): TEM-AHERA, TEM-ISO 10312, PCM-NIOSH 7400, PLM-NIOSH 9002,
EPA/600/R-93/116, ASTM D5755-95, EPA/540/2-90/005a, Other: _____

Requester: Jeanne Spencer Orr

Title: President

Company: Reservoirs Environmental, Inc.

Date: 10/29/02

Description of Modification:

Original data recorded using historical laboratory nomenclature at RESI. Data Sheets updated to ISO 10312 Nomenclature and empty fields were filled in and data was entered into the Excel Spreadsheet.

Reason for Modification:

To document that previously submitted data sheets were revised to reflect use of consistent nomenclature across labs and current data reporting requirements.

Potential Implications of this Modification:

Allows data to be consistent with current data reporting.

Laboratory Applicability (circle one): All Individual(s) RESI _____

Duration of Modification (circle one):

Temporary

Date(s): All associated with RES 74158

Analytical Batch ID: Air samples 1-01921 through 1-01923

Temporary Modification Forms – Attach legible copies of approved form w/ all associated raw data packages

Permanent (complete Proposed Modification Section)

Permanent Modification Forms – Maintain legible copies of approved form in a binder that can be accessed by analysts.

Proposed Modification to Method (attach additional sheets if necessary; state section and page numbers of Method when applicable):

Technical Review: [Signature]
(Laboratory Manager or designate)

Date: 4/10/03

Project Review and Approval: [Signature]
(Volpe: Project Technical Lead or designate)

Date: 4/10/03

Approved By: [Signature]
(USEPA: Project Chemist or designate)

Title: Project Chemist Date: 4/10/03

Raney, Mark

From: Goldade.Mary@epamail.epa.gov
Sent: Thursday, April 10, 2003 4:10 PM
To: Raney, Mark
Cc: Autio, Anni; 'Beckham, Richard'; 'Orr, Jeaane at Reservoir Env'; 'mgoldade@peakpeak.com';
Raney, Mark
Subject: EPA Approved: MODs 1-14



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-10-03 email).d.-10-03 email).d.-10-03 email).d.-10-03 email).d.-10-03 email).d.-10-03 email).d..

EPA approves all MODs 1-14 as modified by Mark Raney on 4-10-03.
(Embedded image moved to file: pic15881.gif)

"Raney, Mark"

<RANEY@VOLPE.DOT.
Richard' <BeckhamRE@cdm.com>, "Raney, Mark"
GOV>
Mary Goldade/EPR/R8/USEPA/US@EPA, "'mgoldade@peakpeak.com'"
<RANEY@VOLPE.DOT.GOV>,
<mgoldade@peakpeak.com>
04/10/03 08:05 AM cc: "Autio, Anni"
<AutioAH@cdm.com>, "'Orr, Jeaane at Reservoir Env'"
<jeanneorr@resienv.com>
Subject: RE: MODs 1-14

All 14 of these MODs (MODs 1- 14) have not been revised to reflect Mary and my comments from March 13. In those emails we identified that:

1. The date needed to be corrected (i.e., says 10/29/03 not 10/29/02)
2. The "Reason for Modification" section had not been completed.

I have made the following changes to attached/revised MODs to reflect the above points:

1. Date changed to "10/29/02"
2. The following text was added to the "Reason for Modification" section: "To document that previously submitted data sheets were revised to reflect use of consistent nomenclature across labs and current data reporting requirements."

Upon receiving Mary's approval to the attached changes RESI may accept

the changes/finalize, sign, and send hardcopies out for signature.
Let me know if there are any questions as to how to proceed.

Mark.

<<LB-000001 (MR 4-10-03 email).doc>> <<LB-000002 (MR 4-10-03 email).doc>> <<LB-000003 (MR 4-10-03 email).doc>> <<LB-000004 (MR 4-10-03 email).doc>> <<LB-000005 (MR 4-10-03 email).doc>> <<LB-000006 (MR 4-10-03 email).doc>> <<LB-000007 (MR 4-10-03 email).doc>> <<LB-000008 (MR 4-10-03 email).doc>> <<LB-000009 (MR 4-10-03 email).doc>> <<LB-000010 (MR 4-10-03 email).doc>> <<LB-000011 (MR 4-10-03 email).doc>> <<LB-000012 (MR 4-10-03 email).doc>> <<LB-000013 (MR 4-10-03 email).doc>> <<LB-000014 (MR 4-10-03 email).doc>>

-----Original Message-----

From: Beckham, Richard [mailto:BeckhamRE@cdm.com]
Sent: Monday, April 07, 2003 10:32 AM
To: 'RANEY@VOLPE.DOT.GOV'; 'Goldade.Mary@epamail.epa.gov'; 'mgoldade@peakpeak.com'
Cc: Autio, Anni
Subject: MODs 1-14

For your review and approval.

- Richard Beckham

<<LB-000001.doc>> <<LB-000002.doc>> <<LB-000003.doc>>
<<LB-000004.doc>> <<LB-000005.doc>> <<LB-000006.doc>> <<LB-000007.doc>>
<<LB-000008.doc>> <<LB-000009.doc>> <<LB-000010.doc>> <<LB-000011.doc>>
<<LB-000012.doc>> <<LB-000013.doc>> <<LB-000014.doc>> << File: LB-000001.doc >> <<
File: LB-000002.doc >> << File: LB-000003.doc >> << File:
LB-000004.doc >> << File: LB-000005.doc >> << File: LB-000006.doc >>
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LB-000009.doc >> << File: LB-000010.doc >> << File: LB-000011.doc >>
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LB-000014.doc >>
(See attached file: LB-000001 (MR 4-10-03 email).doc)(See attached file:
LB-000002 (MR 4-10-03 email).doc)(See attached file: LB-000003 (MR
4-10-03 email).doc)(See attached file: LB-000004 (MR 4-10-03 email).doc)
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LB-000010 (MR 4-10-03 email).doc)(See attached file: LB-000011 (MR
4-10-03 email).doc)(See attached file: LB-000012 (MR 4-10-03 email).doc)
(See attached file: LB-000013 (MR 4-10-03 email).doc)(See attached file:
LB-000014 (MR 4-10-03 email).doc)



Request for Modification

To
Laboratory Activities
LB-000011

Instructions to Requester: E-mail form to contacts at bottom of form for review and approval.

File approved copy with Data Manager (CDM). Data Manager distributes approved forms as follows:

All Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, All project labs

Individual Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, Initiating Lab

Method (circle one/those applicable): TEM-AHERA, TEM-ISO 10312, PCM-NIOSH 7400, PLM-NIOSH 9002, EPA/600/R-93/116, ASTM D5755-95, EPA/540/2-90/005a, Other: _____

Requester: Jeanne Spencer Orr

Title: President

Company: Reservoirs Environmental, Inc.

Date: 10/29/02

Description of Modification:

Original data recorded using historical laboratory nomenclature at RESI. Data Sheets updated to ISO 10312 Nomenclature and empty fields were filled in and data was entered into the Excel Spreadsheet.

Reason for Modification:

To document that previously submitted data sheets were revised to reflect use of consistent nomenclature across labs and current data reporting requirements.

Potential Implications of this Modification:

Allows data to be consistent with current data reporting.

Laboratory Applicability (circle one): All Individual(s) RESI

Duration of Modification (circle one):

Temporary

Date(s): All associated with RES 74159

Analytical Batch ID: Air samples 1-01916 through 1-01920

Temporary Modification Forms – Attach legible copies of approved form w/ all associated raw data packages

Permanent (complete Proposed Modification Section)

Permanent Modification Forms – Maintain legible copies of approved form in a binder that can be accessed by analysts.

Proposed Modification to Method (attach additional sheets if necessary; state section and page numbers of Method when applicable):

Technical Review: [Signature]
(Laboratory Manager or designate)

Date: 4/10/03

Project Review and Approval: [Signature]
(Volpe: Project Technical Lead or designate)

Date: 4/10/03

Approved By: Judy Goldade
(USEPA: Project Chemist or designate)

Title: Project Chemist Date: 4/10/03

From: Goldade.Mary@epamail.epa.gov
Sent: Thursday, April 10, 2003 4:10 PM
To: Raney, Mark
Cc: Autio, Anni; 'Beckham, Richard'; 'Orr, Jeaane at Reservoir Env'; 'mgoldade@peakpeak.com';
Raney, Mark
Subject: EPA Approved: MODs 1-14



1

the changes/finalize, sign, and send hardcopies out for signature.
Let me know if there are any questions as to how to proceed.

Mark.

<<LB-000001 (MR 4-10-03 email).doc>> <<LB-000002 (MR 4-10-03 email).doc>> <<LB-000003 (MR 4-10-03 email).doc>> <<LB-000004 (MR 4-10-03 email).doc>> <<LB-000005 (MR 4-10-03 email).doc>> <<LB-000006 (MR 4-10-03 email).doc>> <<LB-000007 (MR 4-10-03 email).doc>> <<LB-000008 (MR 4-10-03 email).doc>> <<LB-000009 (MR 4-10-03 email).doc>> <<LB-000010 (Mr 4-10-03 email).doc>> <<LB-000011 (MR 4-10-03 email).doc>> <<LB-000012 (MR 4-10-03 email).doc>> <<LB-000013 (MR 4-10-03 email).doc>> <<LB-000014 (MR 4-10-03 email).doc>>

-----Original Message-----

From: Beckham, Richard [mailto:BeckhamRE@cdm.com]
Sent: Monday, April 07, 2003 10:32 AM
To: 'RANEY@VOLPE.DOT.GOV'; 'Goldade.Mary@epamail.epa.gov';
'mgoldade@peakpeak.com'
Cc: Autio, Anni
Subject: MODs 1-14

For your review and approval.

- Richard Beckham

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<<LB-000012.doc>> <<LB-000013.doc>> <<LB-000014.doc>> << File: LB-000001.doc >> <<
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LB-000004.doc >> << File: LB-000005.doc >> << File: LB-000006.doc >>
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LB-000009.doc >> << File: LB-000010.doc >> << File: LB-000011.doc >>
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LB-000014.doc >>
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(See attached file: LB-000013 (MR 4-10-03 email).doc)(See attached file:
LB-000014 (MR 4-10-03 email).doc)



Request for Modification
To
Laboratory Activities
LB-000012

Instructions to Requester: E-mail form to contacts at bottom of form for review and approval.

File approved copy with Data Manager (CDM). Data Manager distributes approved forms as follows:

All Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, All project labs

Individual Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, Initiating Lab

Method (circle one/those applicable): TEM-AHERA, TEM-ISO 10312, PCM-NIOSH 7400, PLM-NIOSH 9002,
EPA/600/R-93/116, ASTM D5755-95, EPA/540/2-90/005a, Other: _____

Requester: Jeanne Spencer Orr

Title: President

Company: Reservoirs Environmental, Inc.

Date: 10/29/02

Description of Modification:

Original data recorded using historical laboratory nomenclature at RESI. Data Sheets updated to ISO 10312 Nomenclature and empty fields were filled in and data was entered into the Excel Spreadsheet.

Reason for Modification:

To document that previously submitted data sheets were revised to reflect use of consistent nomenclature across labs and current data reporting requirements.

Potential Implications of this Modification:

Allows data to be consistent with current data reporting.

Laboratory Applicability (circle one): All Individual(s) RESI

Duration of Modification (circle one):

Temporary

Date(s): All associated with RES 74160

Analytical Batch ID: Air samples 1-01924 through 1-01926

Temporary Modification Forms – Attach legible copies of approved form w/ all associated raw data packages

Permanent (complete Proposed Modification Section)

Permanent Modification Forms – Maintain legible copies of approved form in a binder that can be accessed by analysts.

Proposed Modification to Method (attach additional sheets if necessary; state section and page numbers of Method when applicable):

Technical Review: [Signature]
(Laboratory Manager or designate)

Date: 4/10/03

Project Review and Approval: [Signature]
(Volpe: Project Technical Lead or designate)

Date: 4/10/03

Approved By: [Signature]
(USEPA: Project Chemist or designate)

Title: Project Chemist Date: 4/10/03

Raney, Mark

From: Goldade.Mary@epamail.epa.gov
Sent: Thursday, April 10, 2003 4:10 PM
To: Raney, Mark
Cc: Autio, Anni; 'Beckham, Richard'; 'Orr, Jeaane at Reservoir Env'; 'mgoldade@peakpeak.com';
Raney, Mark
Subject: EPA Approved: MODs 1-14

        
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EPA approves all MODs 1-14 as modified by Mark Raney on 4-10-03.
(Embedded image moved to file: pic15881.gif)

"Raney, Mark"

<RANEY@VOLPE.DOT.
Richard' <BeckhamRE@cdm.com>, "Raney, Mark"
GOV>
y Goldade/EPR/R8/USEPA/US@EPA, "'mgoldade@peakpeak.com'"
<mgoldade@peakpeak.com>
04/10/03 08:05 AM cc: "Autio, Anni"
<AutioAH@cdm.com>, "'Orr, Jeaane at Reservoir Env'"
<jeanneorr@resienv.com>
Subject: RE: MODs 1-14

All 14 of these MODs (MODs 1- 14) have not been revised to reflect Mary and my comments from March 13. In those emails we identified that:

1. The date needed to be corrected (i.e., says 10/29/03 not 10/29/02)
2. The "Reason for Modification" section had not been completed.

I have made the following changes to attached/revised MODs to reflect the above points:

1. Date changed to "10/29/02"
2. The following text was added to the "Reason for Modification" section: "To document that previously submitted data sheets were revised to reflect use of consistent nomenclature across labs and current data reporting requirements."

Upon receiving Mary's approval to the attached changes RESI may accept

the changes/finalize, sign, and send hardcopies out for signature.
Let me know if there are any questions as to how to proceed.

Mark.

<<LB-000001 (MR 4-10-03 email).doc>> <<LB-000002 (MR 4-10-03
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4-10-03 email).doc>> <<LB-000012 (MR 4-10-03 email).doc>> <<LB-000013
(MR 4-10-03 email).doc>> <<LB-000014 (MR 4-10-03 email).doc>>

-----Original Message-----

From: Beckham, Richard [mailto:BeckhamRE@cdm.com]
Sent: Monday, April 07, 2003 10:32 AM
To: 'RANEY@VOLPE.DOT.GOV'; 'Goldade.Mary@epamail.epa.gov';
'mgoldade@peakpeak.com'
Cc: Autio, Anni
Subject: MODs 1-14

For your review and approval.

- Richard Beckham

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<<LB-000012.doc>> <<LB-000013.doc>> <<LB-000014.doc>> << File: LB-000001.doc >> <<
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LB-000004.doc >> << File: LB-000005.doc >> << File: LB-000006.doc >>
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LB-000009.doc >> << File: LB-000010.doc >> << File: LB-000011.doc >>
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LB-000014.doc >>
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(See attached file: LB-000013 (MR 4-10-03 email).doc)(See attached file:
LB-000014 (MR 4-10-03 email).doc)



Request for Modification

To

Laboratory Activities

LB-000013

Instructions to Requester: E-mail form to contacts at bottom of form for review and approval.

File approved copy with Data Manager (CDM). Data Manager distributes approved forms as follows:

All Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, All project labs

Individual Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, Initiating Lab

Method (circle one/those applicable): TEM-AHERA, TEM-ISO 10312, PCM-NIOSH 7400, PLM-NIOSH 9002, EPA/600/R-93/116, ASTM D5755-95, EPA/540/2-90/005a, Other: _____

Requester: Jeanne Spencer Orr

Title: President

Company: Reservoirs Environmental, Inc.

Date: 10/29/02

Description of Modification:

Original data recorded using historical laboratory nomenclature at RESI. Data Sheets updated to ISO 10312 Nomenclature and empty fields were filled in and data was entered into the Excel Spreadsheet.

Reason for Modification:

To document that previously submitted data sheets were revised to reflect use of consistent nomenclature across labs and current data reporting requirements.

Potential Implications of this Modification:

Allows data to be consistent with current data reporting.

Laboratory Applicability (circle one): All Individual(s) RESI

Duration of Modification (circle one):

Temporary

Date(s): All associated with RES 74409

Analytical Batch ID: Air samples 1R-04028 through 1R-04039, 1R-04019, 1-00637 through 1-00642, and 1-01399 through 1-01403

Temporary Modification Forms – Attach legible copies of approved form w/ all associated raw data packages

Permanent (complete Proposed Modification Section)

Permanent Modification Forms – Maintain legible copies of approved form in a binder that can be accessed by analysts.

Proposed Modification to Method (attach additional sheets if necessary; state section and page numbers of Method when applicable):

Technical Review: [Signature]

(Laboratory Manager or designate)

Date: 4/10/03

Project Review and Approval: [Signature]

(Volpe: Project Technical Lead or designate)

Date: 4/10/03

Approved By: [Signature]

Title: Project Chemist

Date: 4/10/03

Raney, Mark

From: Goldade.Mary@epamail.epa.gov
Sent: Thursday, April 10, 2003 4:10 PM
To: Raney, Mark
Cc: Autio, Anni; 'Beckham, Richard'; 'Orr, Jeaane at Reservoir Env'; 'mgoldade@peakpeak.com';
Raney, Mark
Subject: EPA Approved: MODs 1-14



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EPA approves all MODs 1-14 as modified by Mark Raney on 4-10-03.
(Embedded image moved to file: pic15881.gif)

"Raney, Mark"

<RANEY@VOLPE.DOT.
Richard'" <BeckhamRE@cdm.com>, "Raney, Mark"
GOV>
y Goldade/EPR/R8/USEPA/US@EPA, "'mgoldade@peakpeak.com'"
<mgoldade@peakpeak.com>
04/10/03 08:05 AM cc: "Autio, Anni"
<AutioAH@cdm.com>, "'Orr, Jeaane at Reservoir Env'"
<jeanneorr@resienv.com>
Subject: RE: MODs 1-14

All 14 of these MODs (MODs 1- 14) have not been revised to reflect Mary
and my comments from March 13. In those emails we identified that:

1. The date needed to be corrected (i.e., says 10/29/03 not 10/29/02)
2. The "Reason for Modification" section had not been completed.

I have made the following changes to attached/revised MODs to reflect
the above points:

1. Date changed to "10/29/02"
2. The following text was added to the "Reason for Modification"
section: "To document that previously submitted data sheets were
revised to reflect use of consistent nomenclature across labs and
current data reporting requirements."

Upon receiving Mary's approval to the attached changes RESI may accept

the changes/finalize, sign, and send hardcopies out for signature.
Let me know if there are any questions as to how to proceed.

Mark.

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Sent: Monday, April 07, 2003 10:32 AM
To: 'RANEY@VOLPE.DOT.GOV'; 'Goldade.Mary@epamail.epa.gov'; 'mgoldade@peakpeak.com'
Cc: Autio, Anni
Subject: MODs 1-14

For your review and approval.

- Richard Beckham

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Request for Modification
To
Laboratory Activities
LB-000014

Instructions to Requester: E-mail form to contacts at bottom of form for review and approval.

File approved copy with Data Manager (CDM). Data Manager distributes approved forms as follows:

All Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, All project labs

Individual Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, Initiating Lab

Method (circle one/those applicable): TEM-AHERA, TEM-ISO 10312, PCM-NIOSH 7400, PLM-NIOSH 9002,
EPA/600/R-93/116, ASTM D5755-95, EPA/540/2-90/005a, Other: _____

Requester: Jeanne Spencer Orr

Title: President

Company: Reservoirs Environmental, Inc.

Date: 10/29/02

Description of Modification:

Original data recorded using historical laboratory nomenclature at RESI. Data Sheets updated to ISO 10312 Nomenclature and empty fields were filled in and data was entered into the Excel Spreadsheet.

Reason for Modification:

To document that previously submitted data sheets were revised to reflect use of consistent nomenclature across labs and current data reporting requirements.

Potential Implications of this Modification:

Allows data to be consistent with current data reporting.

Laboratory Applicability (circle one): All Individual(s) RESI _____

Duration of Modification (circle one):

Temporary

Date(s): All associated with RES 76750

Analytical Batch ID: Air Samples 2-00498, 2-00485 and 2-00487

Temporary Modification Forms – Attach legible copies of approved form w/ all associated raw data packages

Permanent (complete Proposed Modification Section)

Permanent Modification Forms – Maintain legible copies of approved form in a binder that can be accessed by analysts.

Proposed Modification to Method (attach additional sheets if necessary; state section and page numbers of Method when applicable):

Technical Review: Jeanne Spencer Orr
(Laboratory Manager or designate)

Date: 4/10/03

Project Review and Approval: Mark P. [Signature]
(Volpe: Project Technical Lead or designate)

Date: 4/10/03

Approved By: Jane Guldade
(USEPA: Project Chemist or designate)

Title: Project Chemist Date: 4/10/03

Raney, Mark

From: Goldade.Mary@epamail.epa.gov
Sent: Thursday, April 10, 2003 4:10 PM
To: Raney, Mark
Cc: Autio, Anni; 'Beckham, Richard'; 'Orr, Jeaane at Reservoir Env'; 'mgoldade@peakpeak.com';
Raney, Mark
Subject: EPA Approved: MODs 1-14



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EPA approves all MODs 1-14 as modified by Mark Raney on 4-10-03.
(Embedded image moved to file: pic15881.gif)

"Raney, Mark"

<RANEY@VOLPE.DOT.
Richard'" <BeckhamRE@cdm.com>, "Raney, Mark"
GOV>
y Goldade/EPR/R8/USEPA/US@EPA, "'mgoldade@peakpeak.com'"
<mgoldade@peakpeak.com>
04/10/03 08:05 AM cc: "Autio, Anni"
<AutioAH@cdm.com>, "'Orr, Jeaane at Reservoir Env'"
<jeanneorr@resienv.com>
Subject: RE: MODs 1-14

All 14 of these MODs (MODs 1- 14) have not been revised to reflect Mary and my comments from March 13. In those emails we identified that:

1. The date needed to be corrected (i.e., says 10/29/03 not 10/29/02)
2. The "Reason for Modification" section had not been completed.

I have made the following changes to attached/revised MODs to reflect the above points:

1. Date changed to "10/29/02"
2. The following text was added to the "Reason for Modification" section: "To document that previously submitted data sheets were revised to reflect use of consistent nomenclature across labs and current data reporting requirements."

Upon receiving Mary's approval to the attached changes RESI may accept

the changes/finalize, sign, and send hardcopies out for signature.
Let me know if there are any questions as to how to proceed.

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email).doc>> <<LB-000010 (Mr 4-10-03 email).doc>> <<LB-000011 (MR
4-10-03 email).doc>> <<LB-000012 (MR 4-10-03 email).doc>> <<LB-000013
(MR 4-10-03 email).doc>> <<LB-000014 (MR 4-10-03 email).doc>>

-----Original Message-----

From: Beckham, Richard [mailto:BeckhamRE@cdm.com]
Sent: Monday, April 07, 2003 10:32 AM
To: 'RANEY@VOLPE.DOT.GOV'; 'Goldade.Mary@epamail.epa.gov';
'mgoldade@peakpeak.com'
Cc: Autio, Anni
Subject: MODs 1-14

For your review and approval.

- Richard Beckham

<<LB-000001.doc>> <<LB-000002.doc>> <<LB-000003.doc>>
<<LB-000004.doc>>
<<LB-000005.doc>> <<LB-000006.doc>> <<LB-000007.doc>>
<<LB-000008.doc>>
<<LB-000009.doc>> <<LB-000010.doc>> <<LB-000011.doc>>
<<LB-000012.doc>>
<<LB-000013.doc>> <<LB-000014.doc>> << File: LB-000001.doc >> <<
File: LB-000002.doc >> << File: LB-000003.doc >> << File:
LB-000004.doc >> << File: LB-000005.doc >> << File: LB-000006.doc >>
<< File: LB-000007.doc >> << File: LB-000008.doc >> << File:
LB-000009.doc >> << File: LB-000010.doc >> << File: LB-000011.doc >>
<< File: LB-000012.doc >> << File: LB-000013.doc >> << File:
LB-000014.doc >>
(See attached file: LB-000001 (MR 4-10-03 email).doc) (See attached file:
LB-000002 (MR 4-10-03 email).doc) (See attached file: LB-000003 (MR
4-10-03 email).doc) (See attached file: LB-000004 (MR 4-10-03 email).doc)
(See attached file: LB-000005 (MR 4-10-03 email).doc) (See attached file:
LB-000006 (MR 4-10-03 email).doc) (See attached file: LB-000007 (MR
4-10-03 email).doc) (See attached file: LB-000008 (MR 4-10-03 email).doc)
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LB-000010 (MR 4-10-03 email).doc) (See attached file: LB-000011 (MR
4-10-03 email).doc) (See attached file: LB-000012 (MR 4-10-03 email).doc)
(See attached file: LB-000013 (MR 4-10-03 email).doc) (See attached file:
LB-000014 (MR 4-10-03 email).doc)



Request for Modification
To
Laboratory Activities
LB-000015

Instructions to Requester: E-mail form to contacts at bottom of form for review and approval.

File approved copy with Data Manager (CDM). Data Manager distributes approved forms as follows:

All Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, All project labs

Individual Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, Initiating Lab

Method: (circle one/those most applicable): TEM-AHERA, TEM-ISO, PCM-NIOSH 7400, PLM-NIOSH 9002,
EPA/600/R-93/116, ASTM D5755-95, EPA/540/2-90/005a, Other: _____

Requester: Jeanne Orr Title: President
Company: Reservoirs Environmental Date: October 30, 2002

Description of Modification:

Permanent modifications and clarifications to the Phase Contrast Microscopy analysis of air samples using NIOSH 7400 are attached. The purpose of the attached is to document permanent historic modifications & clarifications.

Reason for Modification:

To obtain PCM analyses on samples with high particulate debris

Potential Implications of this Modification:

Modifications reflect changes necessary to clarify ISO requirements in relation to project-specific issues and to eliminate questions that may be posed regarding a TEM indirect preparation technique applied to PCM sample preparation. No negative implications to these modifications are anticipated. Positive implications are consistency in procedures between and within project laboratories and documentation of those procedures.

Laboratory Applicability (circle one): All Individual(s) _____

Duration of Modification (circle one):

Temporary Date(s): _____

Analytical Batch ID: _____

Temporary Modification Forms – Attach legible copies of approved form w/ all associated raw data packages

Permanent (complete Proposed Modification Section) Effective Date: HISTORIC

Permanent Modification Forms – Maintain legible copies of approved form in a binder that can be accessed by PCM analysts.

Proposed Modification to Method (attach additional sheets if necessary; state section and page numbers of Method when applicable):

Please see the attached for the description of the PCM 7400 modifications/clarifications

Technical Review: R.K. Mahony EMSL Date: 23 April 2003
(Laboratory Manager or designate)

Project Review and Approval: Mark Raney Date: 4 April 2003
(VolpeMark Raney)

Approved By: Mary Goldade Title: Project Operator Date: 3 April 2003
(USEPA: Mary Goldade)

PCM Analyses, NIOSH 7400

Method reference: "High Levels of non-fibrous dust particles may obscure fibers in the field of view and increase the detection limit." And fiber counts from samples with >50% of filter area covered with particulate should be reported as "uncountable" or "probably biased". Overload rejection criteria for the project is 25 %. The 25 % overload criteria resulted from various communications that took place 29 December 1999 between EPA Region 8, Camp Dresser McKee, Volpe Center, and Reservoirs.

If samples are visibly overloaded or contain loose debris and they have not been previously analyzed (the filter is whole) they will be prepared indirectly according to procedures described in ASTM D5755-95. If the sample has been previously analyzed or rejected under the PCM microscope (section removed from the filter), prepare the sample indirectly according to EPA/540/2-90/005a by plasma ashing a portion of the original filter and depositing an aliquot on a secondary filter. A PCM count according to NIOSH 7400 will be performed on the secondary preparation. Calculations will be modified in these samples to include a dilution factor.

In situations where an unusual number of very long structures are observed which are non-countable by virtue of crossing the counting graticle perimeter twice, a notation will be made on the bench sheet to that effect, but the structures shall not be counted.

Mahoney, Ron

From: Raney, Mark [RANEY@VOLPE.DOT.GOV]
Sent: Tuesday, April 22, 2003 11:09 AM
To: 'Mahoney, Ron'
Subject: FW: VOLPE Approved MODS: LB-000015, LB-000016, and LB-000017



LB-000015_rev (MR
4-4-03 email...



LB-000016_rev (MR
4-4-03 email...



LB-000017_rev (MR
4-4-03 email...

FYI

> -----Original Message-----

> From: Raney, Mark
> Sent: Friday, April 04, 2003 9:31 AM
> To: 'Beckham, Richard'; 'Goldade.mary@EPAMail.epa.gov'; 'mgoldade@peakpeak.com'
> Cc: Autio, Anni
> Subject: VOLPE Approved MODS: LB-000015, LB-000016, and LB-000017

> Volpe provides approval to revised MODs LB-000015, LB-000016, & LB-000017 as attached. The attached MODs include the following changes to the previous versions (received 4/1/03).

> * The date indicated in the "Effective Date" field was removed and replaced with "HISTORIC"
> * Under the "Description of Modification" section the following sentence was added "The purpose of the attached is to document permanent historic modifications & clarifications."

> If you have any questions as to these changes or the reason behind them let me know. Please proceed with distribution of the accepted versions of the attached for final hardcopy signature.

> Mark.

> > <<LB-000015_rev (MR 4-4-03 email).doc>> > <<LB-000016_rev (MR 4-4-03 email).doc>> > <<LB-000017_rev (MR 4-4-03 email).doc>>

> -----Original Message-----

> From: Beckham, Richard [mailto:BeckhamRE@cdm.com]
> Sent: Tuesday, April 01, 2003 10:47 AM
> To: 'Goldade.mary@EPAMail.epa.gov'; 'RANEY@VOLPE.DOT.GOV'; 'mgoldade@peakpeak.com'
> Cc: Autio, Anni
> Subject: FW: LB-000015, LB-000016, and LB-000017

> For your review and approval.

> - Richard Beckham

> -----Original Message-----

> From: Mahoney, Ron [mailto:Rmahoney@EMSL.com]
> Sent: Monday, March 31, 2003 6:11 PM
> To: Beckham, Richard
> Subject: LB-000015, LB-000016, and LB-000017

> Richard,

> These should be final. The only recent revision is the addition of the Effective Date. These need to go to Mark and Mary for their final blessing.

> <<LB-000015(rev 3_31_03).doc>> <<LB-000016 rev. (3_31_03).doc>>

> <<LB-000017 rev(3_31_03).doc>>

>

> R.K. Mahoney

> Senior Analyst

> Special Projects Coordinator

> EMSL Analytical, Inc.

> Westmont, NJ

> 800.220.3675, x1218

> rmahoney@emsl.com

>

> << File: LB-000015(rev 3_31_03).doc >> << File: LB-000016 rev. (3_31_03).doc >> << File: LB-000017 rev(3_31_03).doc >>

Mahoney, Ron

From: Raney, Mark [RANEY@VOLPE.DOT.GOV]
Sent: Wednesday, April 23, 2003 9:02 AM
To: 'Mahoney, Ron'
Subject: FW: EPA APPROVED CONDITIONAL: LB-000015, LB-000016, and LB-000017



LB-000015(rev
3_31_03).doc



LB-000016 rev.
(3_31_03).doc



LB-000017
rev(3_31_03).doc

Ron,

I almost forgot to forward you this....

See Mary's earlier email below, regarding EPA's approval for MODs LB-15, 16, & 17.

Let me know if you have any questions.

Mark.

-----Original Message-----

From: Goldade.Mary@epamail.epa.gov [mailto:Goldade.Mary@epamail.epa.gov]
Sent: Thursday, April 03, 2003 5:49 PM
To: Beckham, Richard
Cc: Autio, Anni; 'mgoldade@peakpeak.com'; 'RANEY@VOLPE.DOT.GOV'
Subject: EPA APPROVED CONDITIONAL: LB-000015, LB-000016, and LB-000017

Richard,
Mark will modify LB-000015, 16 & 17 to indicate that the Effective Date
is: Historical.
EPA approves these mods with this changed completed.

"Beckham,
Richard" To: Mary Goldade/EPR/R8/USEPA/US@EPA, "RANEY@VOLPE.DOT.GOV"
<BeckhamRE@cdm.com> <RANEY@VOLPE.DOT.GOV>, "mgoldade@peakpeak.com"
<mgoldade@peakpeak.com>
m> cc: "Autio, Anni" <AutioAH@cdm.com>
Subject: FW: LB-000015, LB-000016, and LB-000017
04/01/03 08:47 AM

For your review and approval.

- Richard Beckham

-----Original Message-----

From: Mahoney, Ron [mailto:Rmahoney@EMSL.com]
Sent: Monday, March 31, 2003 6:11 PM
To: Beckham, Richard

Subject: LB-000015, LB-000016, and LB-000017

Richard,

These should be final. The only recent revision is the addition of the Effective Date. These need to go to Mark and Mary for their final blessing.

<<LB-000015(rev 3_31_03).doc>> <<LB-000016 rev. (3_31_03).doc>>
<<LB-000017 rev(3_31_03).doc>>

R.K. Mahoney
Senior Analyst
Special Projects Coordinator
EMSL Analytical, Inc.
Westmont, NJ
800.220.3675, x1218
rmahoney@emsl.com

(See attached file: LB-000015(rev 3_31_03).doc)(See attached file:
LB-000016 rev. (3_31_03).doc)(See attached file: LB-000017
rev(3_31_03).doc)



Request for Modification

To
Laboratory Activities
LB-000016

Instructions to Requester: E-mail form to contacts at bottom of form for review and approval.

File approved copy with Data Manager (CDM). Data Manager distributes approved forms as follows:

All Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, All project labs

Individual Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, Initiating Lab

Method (circle one/those applicable): TEM-AHERA, TEM-ISO 10312, PCM-NIOSH 7400, PLM-NIOSH 9002,
EPA/600/R-93/116, ASTM D5755-95, EPA/540/2-90/005a, Other: _____

Requester: Jeanne Orr

Title: President

Company: Reservoirs Environmental, Inc.

Date: December 2, 2002

Description of Modification:

Permanent modifications and clarifications to the Transmission Electron Microscopy analysis of air samples using ISO 10312. The purpose of the attached is to document permanent historic modifications & clarifications.

Reason for Modification:

To optimize the efficiency of air sample analysis and to provide consistency in analytical procedures and data recording in the project laboratories.

Potential Implications of this Modification:

Modifications reflect changes necessary to clarify ISO requirements in relation to project-specific issues. No negative implications to these modifications are anticipated. Positive implications are consistency in procedures between and within project laboratories and documentation of those procedures.

Laboratory Applicability (circle one): All Individual(s) _____

Duration of Modification (circle one):

Temporary Date(s): _____

Analytical Batch ID: _____

Temporary Modification Forms – Attach legible copies of approved form w/ all associated raw data packages

Permanent (complete Proposed Modification Section) Effective Date: HISTORIC

Permanent Modification Forms – Maintain legible copies of approved form in a binder that can be accessed by TEM analysts.

Proposed Modification to Method (attach additional sheets if necessary; state section and page numbers of Method when applicable):

Please see the attached for the description of the TEM-ISO clarifications/modifications

Technical Review: R.K. Mahony EMEU
(Laboratory Manager or designate)

Date: 23 April 2003

Project Review and Approval: Mark Raney
(Volpe: Mark Raney)

Date: 4 April 2003

Approved By: Mary Goldade
(USEPA: Mary Goldade)

Title: Project Chemist Date: 3 April 2003

1. Modification:

The ISO method requirement is if the specimen grid exhibits more than approximately 10% obscuration on the majority of the grid openings, the specimen shall be designated as overloaded. A rejection criteria of >25% obscuration and <50% intact grid openings will be used for this project. The 25 % overload criteria resulted from various communications that took place 29 December 1999 between EPA Region 8, Camp Dresser McKee, Volpe Center, and Reservoirs.

2. Modification:

ISO 10312 is a direct preparation method. If samples are visibly overloaded or contain loose debris and they have not been previously analyzed (the filter is whole) they will be prepared indirectly according to procedures described in ASTM D5755-95. If the sample has been previously analyzed or rejected in the microscope (section removed from the filter), prepare the sample indirectly according to EPA/540/2-90/005a by plasma ashing a portion of the original filter and depositing an aliquot on a secondary filter. Secondary filters will be analyzed according to the ISO counting rules for this project. Calculations are modified to contain a dilution factor. This indirect preparation procedure is embraced to enable the capture of data from samples that otherwise would be rejected.

3. Clarification:

Stopping rules for ISO analyses are completion of the grid opening on which the 100th asbestos structure has been recorded, or a minimum of four grid openings. For this project, a maximum of ten grid openings will be read unless specifically instructed otherwise.

If abundant chrysotile is present, the chrysotile count may be terminated at the end of the grid opening where the 100th chrysotile structure is counted. The analysis will continue recording amphibole fibers only until the remaining grid openings to be analyzed are completed. The grid opening location designation will be followed by a "*" to indicate the grid openings where only amphibole asbestos was recorded, i.e. K6*.

This clarification in structure counting and recording is to provide consistency in analytical procedures and data recording in the project laboratories.

4. Modifications and clarifications: Structure counting and recording

- a. **Modification:** Non-asbestos structures are not being recorded. This project-specific modification stems from our need only to quantify contaminants of concern: the asbestos levels at a given sample location.
- b. **Modification:** The overall dimensions of disperse clusters (CD) and disperse matrices (MD) will not be recorded in two perpendicular directions. The matrix type and individual structures associated with the matrix or cluster will be recorded as described in the ISO method.
- c. **Modification:** Structures that intersect a non-countable grid bar will be recorded on the count sheet but excluded from the structure density and concentration calculations.
- d. **Modification:** If a structure originates in one grid opening and extends into an adjacent grid opening, providing that it does not intersect a non-counting grid bar, the entire length of the fiber is recorded.
- e. **Clarification:** If a structure intersects both a countable and a non-countable grid bar, the observed length of the structure will be recorded.

These modifications and clarifications in structure counting and recording are to provide consistency in analytical procedures and data recording in the project laboratories.

Mahoney, Ron

From: Raney, Mark [RANEY@VOLPE.DOT.GOV]
Sent: Tuesday, April 22, 2003 11:09 AM
To: 'Mahoney, Ron'
Subject: FW: VOLPE Approved MODS: LB-000015, LB-000016, and LB-000017



LB-000015_rev (MR
4-4-03 email...



LB-000016_rev (MR
4-4-03 email...



LB-000017_rev (MR
4-4-03 email...

FYI

> -----Original Message-----

> From: Raney, Mark
> Sent: Friday, April 04, 2003 9:31 AM
> To: 'Beckham, Richard'; 'Goldade.mary@EPAmail.epa.gov'; 'mgoldade@peakpeak.com'
> Cc: Autio, Anni
> Subject: VOLPE Approved MODS: LB-000015, LB-000016, and LB-000017

>
>
> Volpe provides approval to revised MODs LB-000015, LB-000016, & LB-000017 as attached. The attached MODs include the following changes to the previous versions (received 4/1/03).

>
> * The date indicated in the "Effective Date" field was removed and replaced with "HISTORIC"
> * Under the "Description of Modification" section the following sentence was added "The purpose of the attached is to document permanent historic modifications & clarifications."

>
> If you have any questions as to these changes or the reason behind them let me know. Please proceed with distribution of the accepted versions of the attached for final hardcopy signature.

> Mark.
>
> > <<LB-000015_rev (MR 4-4-03 email).doc>> > > <<LB-000016_rev (MR 4-4-03 email).doc>> > > <<LB-000017_rev (MR 4-4-03 email).doc>>

>
>
> -----Original Message-----

> From: Beckham, Richard [mailto:BeckhamRE@cdm.com]
> Sent: Tuesday, April 01, 2003 10:47 AM
> To: 'Goldade.mary@EPAmail.epa.gov'; 'RANEY@VOLPE.DOT.GOV';
> 'mgoldade@peakpeak.com'
> Cc: Autio, Anni
> Subject: FW: LB-000015, LB-000016, and LB-000017

>
>
> For your review and approval.

>
> - Richard Beckham

>
> -----Original Message-----
> From: Mahoney, Ron [mailto:Rmahoney@EMSL.com]
> Sent: Monday, March 31, 2003 6:11 PM
> To: Beckham, Richard
> Subject: LB-000015, LB-000016, and LB-000017

>
>
> Richard,

>
> These should be final. The only recent revision is the addition of the
> Effective Date. These need to go to Mark and Mary for their final blessing.

> <<LB-000015(rev 3_31_03).doc>> <<LB-000016 rev. (3_31_03).doc>>

> <<LB-000017 rev(3_31_03).doc>>

>

> R.K. Mahoney

> Senior Analyst

> Special Projects Coordinator

> EMSL Analytical, Inc.

> Westmont, NJ

> 800.220.3675, x1218

> rmahoney@emsl.com

>

> << File: LB-000015(rev 3_31_03).doc >> << File: LB-000016 rev. (3_31_03).doc >> << File: LB-000017 rev(3_31_03).doc >>

Mahoney, Ron

From: Raney, Mark [RANEY@VOLPE.DOT.GOV]
Sent: Wednesday, April 23, 2003 9:02 AM
To: 'Mahoney, Ron'
Subject: FW: EPA APPROVED CONDITIONAL: LB-000015, LB-000016, and LB-000017



LB-000015(rev
3_31_03).doc



LB-000016 rev.
(3_31_03).doc



LB-000017
rev(3_31_03).doc

Ron,

I almost forgot to forward you this....

See Mary's earlier email below, regarding EPA's approval for MODs LB-15, 16, & 17.

Let me know if you have any questions.

Mark.

-----Original Message-----

From: Goldade, Mary [mailto:Goldade.Mary@epamail.epa.gov]
Sent: Thursday, April 03, 2003 5:49 PM
To: Beckham, Richard
Cc: Autio, Anni; 'mgoldade@peakpeak.com'; 'RANEY@VOLPE.DOT.GOV'
Subject: EPA APPROVED CONDITIONAL: LB-000015, LB-000016, and LB-000017

Richard,
Mark will modify LB-000015, 16 & 17 to indicate that the Effective Date
is: Historical.
EPA approves these mods with this changed completed.

"Beckham,
Richard" To: Mary Goldade/EPR/R8/USEPA/US@EPA, "RANEY@VOLPE.DOT.GOV"
<BeckhamRE@cdm.co <RANEY@VOLPE.DOT.GOV>, "mgoldade@peakpeak.com"
<mgoldade@peakpeak.com>
m> cc: "Autio, Anni" <AutioAH@cdm.com>
 Subject: FW: LB-000015, LB-000016, and LB-000017
04/01/03 08:47 AM

For your review and approval.

- Richard Beckham

-----Original Message-----

From: Mahoney, Ron [mailto:Rmahoney@EMSL.com]
Sent: Monday, March 31, 2003 6:11 PM
To: Beckham, Richard

Subject: LB-000015, LB-000016, and LB-000017

Richard,

These should be final. The only recent revision is the addition of the Effective Date. These need to go to Mark and Mary for their final blessing.

<<LB-000015(rev 3_31_03).doc>> <<LB-000016 rev. (3_31_03).doc>>
<<LB-000017 rev(3_31_03).doc>>

R.K. Mahoney
Senior Analyst
Special Projects Coordinator
EMSL Analytical, Inc.
Westmont, NJ
800.220.3675, x1218
rmahoney@emsl.com

(See attached file: LB-000015(rev 3_31_03).doc)(See attached file:
LB-000016 rev. (3_31_03).doc)(See attached file: LB-000017
rev(3_31_03).doc)



Request for Modification

To
Laboratory Activities
LB-000017

Instructions to Requester: E-mail form to contacts at bottom of form for review and approval.

File approved copy with Data Manager (CDM). Data Manager distributes approved forms as follows:

All Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, All project labs

Individual Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, Initiating Lab

Method (circle one/those applicable): TEM-AHERA, TEM-ISO 10312, PCM-NIOSH 7400, PLM-NIOSH 9002,
EPA600/R-93/116, ASTM D5755-95, EPA/540/2-90/005a, Other: _____

Requester: Jeanne Orr Title: President
Company: Reservoirs Environmental, Inc. Date: December 2, 2002

Description of Modification:

Permanent modifications and clarifications to the Transmission Electron Microscopy analysis of air sample using AHERA. The purpose of the attached is to document permanent historic modifications & clarifications.

Reason for Modification:

To optimize the efficiency of the air analysis and to provide consistency in analytical procedures and data recording in the project laboratories.

Potential Implications of this Modification:

Modifications reflect changes necessary to clarify ISO requirements in relation to project-specific issues. No negative implications to these modifications are anticipated. Positive implications are consistency in procedures between and within project laboratories and documentation of those procedures.

Laboratory Applicability (circle one): All Individual(s) _____

Duration of Modification (circle one):

Temporary Date(s): _____

Analytical Batch ID: _____

Temporary Modification Forms – Attach legible copies of approved form w/ all associated raw data packages

Permanent (complete Proposed Modification Section) Effective Date: HISTORIC

Permanent Modification Forms – Maintain legible copies of approved form in a binder that can be accessed by TEM analysts.

Proposed Modification to Method (attach additional sheets if necessary; state section and page numbers of Method when applicable):

Please see the attached for the description of the TEM-AHERA clarifications/modifications

Technical Review: R.K. Maloney EMSL Date: 23 April 2003
(Laboratory Manager or designate)

Project Review and Approval: [Signature] Date: 4 April 2003
(Volpe: Mark Raney)

Approved By: Mary Goldade Title: Project Chemist Date: 3 April 2003
(USEPA: Mary Goldade)

AIR ANALYSES, AHERA

1. **Clarification:** Record the following in the "structure type" column on the EPA Region 8 spreadsheet.

Fiber	F
Bundle	B
Cluster	C
Matrix	M

If the analyst determines that additional information is needed to describe a structure, comments pertaining to the structure in addition to a sketch will be recorded in the comments column.

2. **Clarification:** The AHERA method requires the analyst to "record the length category and structure type classification on the count sheet after the field number and fiber number". As a clarification to this the actual length and width of individual fibers, bundles, compact clusters and compact matrices will be recorded. For disperse clusters and matrices the length of the longest protruding structure will be recorded (it will not be necessary to record all matrix structures as in ISO 10312). Structure measurements may be recorded in screen units or in microns.
3. **Modification:** AHERA refers to two recording definitions when no fibers are detected in the grid opening, NSD in the text and NFD on the example count sheet. For this project, ND (none detected) will be used.
4. **Clarification:** One of the illustrations in the AHERA rule for bundles is unclear and looks like three fibers. The AHERA written definition for bundles will be used.
5. **Modification:** Grid rejection criteria of >25% obscured area will be used. The 25 % overload criteria resulted from various communications that took place 29 December 1999 between EPA Region 8, Camp Dresser McKee, Volpe Center, and Reservoirs. (The AHERA grid rejection criteria of 10 % has been established and clarified by NVLAP Lab Bulletin 7-2002, July 12, 2002). If samples are visibly overloaded or contain loose debris and they have not been previously analyzed (the filter is whole) they will be prepared indirectly according to procedures described in ASTM D5755-95. If the sample has been previously analyzed or rejected in the microscope (section removed from the filter), prepare the sample indirectly according to EPA/540/2-90/005a by plasma ashing a portion of the original filter and depositing an aliquot on a secondary filter. This indirect preparation procedure is embraced to enable the capture of data from samples that otherwise would be rejected.
6. **Modification:** Cassettes with a 0.8 μm pore size and no 5.0 μm diffuser filter (PCM cassettes) are primarily used for AHERA sample collection.
7. **Modifications/Clarifications:** Structure counting and recording:
 - a. Non-asbestos structures are not being counted or recorded. This project-specific modification stems from our need only to quantify contaminants of concern: the asbestos levels at a given sample location.
 - b. Structures that are non-countable (e.g. for reasons such as insufficient aspect ratio or no exposed termination) are being recorded for informational purposes only, but not included in structure density or structure concentration calculations.
 - c. For a structure originating in one grid opening and extending into an adjacent grid opening, the entire length of the fiber is recorded.
 - d. A maximum of ten grid openings are analyzed for an AHERA analysis, regardless of sample volume.

In some instances the specified analytical sensitivity of 0.005 s/cc may not be obtained.

- e. In some instances, samples are indirectly prepared and read by AHERA protocol.

Mahoney, Ron

From: Raney, Mark [RANEY@VOLPE.DOT.GOV]
Sent: Tuesday, April 22, 2003 11:09 AM
To: 'Mahoney, Ron'
Subject: FW: VOLPE Approved MODS: LB-000015, LB-000016, and LB-000017



LB-000015_rev (MR)
4-4-03 email...



LB-000016_rev (MR)
4-4-03 email...



LB-000017_rev (MR)
4-4-03 email...

FYI

> -----Original Message-----

> From: Raney, Mark
> Sent: Friday, April 04, 2003 9:31 AM
> To: 'Beckham, Richard'; 'Goldade.mary@EPAmail.epa.gov'; 'mgoldade@peakpeak.com'
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> If you have any questions as to these changes or the reason behind them let me know. Please proceed with distribution of the accepted versions of the attached for final hardcopy signature.

> Mark.

> > <<LB-000015_rev (MR 4-4-03 email).doc>> > > <<LB-000016_rev (MR 4-4-03 email).doc>> > > <<LB-000017_rev (MR 4-4-03 email).doc>>

> -----Original Message-----

> From: Beckham, Richard [mailto:BeckhamRE@cdm.com]
> Sent: Tuesday, April 01, 2003 10:47 AM
> To: 'Goldade.mary@EPAmail.epa.gov'; 'RANEY@VOLPE.DOT.GOV';
> 'mgoldade@peakpeak.com'
> Cc: Autio, Anni
> Subject: FW: LB-000015, LB-000016, and LB-000017

> For your review and approval.

> - Richard Beckham

> -----Original Message-----

> From: Mahoney, Ron [mailto:Rmahoney@EMSL.com]
> Sent: Monday, March 31, 2003 6:11 PM
> To: Beckham, Richard
> Subject: LB-000015, LB-000016, and LB-000017

> Richard,

> These should be final. The only recent revision is the addition of the
> Effective Date. These need to go to Mark and Mary for their final blessing.

> <<LB-000015(rev 3_31_03).doc>> <<LB-000016 rev. (3_31_03).doc>>

> <<LB-000017 rev(3_31_03).doc>>

>

> R.K. Mahoney

> Senior Analyst

> Special Projects Coordinator

> EMSL Analytical, Inc.

> Westmont, NJ

> 800.220.3675, x1218

> rmahoney@emsl.com

>

> << File: LB-000015(rev 3_31_03).doc >> << File: LB-000016 rev. (3_31_03).doc >> << File: LB-000017 rev(3_31_03).doc >>

Mahoney, Ron

From: Raney, Mark [RANEY@VOLPE.DOT.GOV]
Sent: Wednesday, April 23, 2003 9:02 AM
To: 'Mahoney, Ron'
Subject: FW: EPA APPROVED CONDITIONAL: LB-000015, LB-000016, and LB-000017



LB-000015(rev
3_31_03).doc



LB-000016 rev.
(3_31_03).doc



LB-000017
rev(3_31_03).doc

Ron,

I almost forgot to forward you this....

See Mary's earlier email below, regarding EPA's approval for MODs LB-15, 16, & 17.

Let me know if you have any questions.

Mark.

-----Original Message-----

From: Goldade, Mary [mailto:Goldade.Mary@epamail.epa.gov]
Sent: Thursday, April 03, 2003 5:49 PM
To: Beckham, Richard
Cc: Autio, Anni; 'mgoldade@peakpeak.com'; 'RANEY@VOLPE.DOT.GOV'
Subject: EPA APPROVED CONDITIONAL: LB-000015, LB-000016, and LB-000017

Richard,
Mark will modify LB-000015, 16 & 17 to indicate that the Effective Date
is: Historical.
EPA approves these mods with this changed completed.

"Beckham,
Richard" **To:** Mary Goldade/EPR/R8/USEPA/US@EPA, "RANEY@VOLPE.DOT.GOV"
<BeckhamRE@cdm.co <RANEY@VOLPE.DOT.GOV>, "mgoldade@peakpeak.com"
<mgoldade@peakpeak.com>
m> **cc:** "Autio, Anni" <AutioAH@cdm.com>
 Subject: FW: LB-000015, LB-000016, and LB-000017
04/01/03 08:47 AM

For your review and approval.

- Richard Beckham

-----Original Message-----

From: Mahoney, Ron [mailto:Rmahoney@EMSL.com]
Sent: Monday, March 31, 2003 6:11 PM
To: Beckham, Richard

Subject: LB-000015, LB-000016, and LB-000017

Richard,

These should be final. The only recent revision is the addition of the Effective Date. These need to go to Mark and Mary for their final blessing.

<<LB-000015(rev 3_31_03).doc>> <<LB-000016 rev. (3_31_03).doc>>
<<LB-000017 rev(3_31_03).doc>>

R.K. Mahoney
Senior Analyst
Special Projects Coordinator
EMSL Analytical, Inc.
Westmont, NJ
800.220.3675, x1218
rmahoney@emsl.com

(See attached file: LB-000015(rev 3_31_03).doc)(See attached file:
LB-000016 rev. (3_31_03).doc)(See attached file: LB-000017
rev(3_31_03).doc)



Request for Modification
To
Laboratory Activities
LB-000018

Instructions to Requester: E-mail form to contacts at bottom of form for review and approval.

File approved copy with Data Manager (CDM). Data Manager distributes approved forms as follows:

All Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, All project labs

Individual Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, Initiating Lab

Method (circle one/those applicable): TEM-AHERA, TEM-ISO 10312, PCM-NIOSH 7400, PLM-NIOSH 9002,
EPA/600/R-93/116, ASTM D5755-95, EPA/540/2-90/005a, Other: _____

Requester: Kyeong Corbin Title: TEM Laboratory Supervisor
Company: Hygeia Laboratories Inc. Date: 12-3-02

Description of Modification:

The purpose of this modification is to clarify that PLM visual estimation analysis via NIOSH 9002 is considered to be interchangeable with EPA 600/R-93/116.

Reason for Modification:

The EPA method is conventionally used for PLM analysis and is inclusive of NIOSH 9002 method for visual estimation. The only subsequent difference between the two PLM methods is that the EPA method includes quantitative analysis such as point count method whereas NIOSH 9002 discourages the use of point count method.

Potential Implications of this Modification:

This modification has no negative implications on the test results.

Laboratory Applicability (circle one): ☒ All Individual(s) _____

Duration of Modification (circle one):

Temporary Date(s): _____

Analytical Batch ID: _____

Temporary Modification Forms – Attach legible copies of approved form w/ all associated raw data packages

☒ Permanent (complete Proposed Modification Section) Effective Date: May 2002

Permanent Modification Forms – Maintain legible copies of approved form in a binder that can be accessed by analysts.

Proposed Modification to Method (attach additional sheets if necessary; state section and page numbers of Method when applicable):

Technical Review: [Signature] Date: 4-9-03
(Laboratory Manager or designate)

Project Review and Approval: Mark Raney Date: 4-9-03
(Volpe: Project Technical Lead or designate)

Approved By: Mary Goldade Date: 4-9-03
(USEPA: Project Chemist or designate)

Kyeong Corbin

From: Goldade.Mary@epamail.epa.gov
Sent: Wednesday, April 09, 2003 8:33 AM
To: Raney, Mark
Cc: Autio, Anni; 'Beckham, Richard'; 'Bill Egeland'; Bob.Shumate@battaenv.com; brattin@syrres.com; 'Charlie LaCerra'; 'Kyeong Corbin'; dmazzaferro@mastest.com; 'Gustavo Delgado'; 'Garth B. Freeman'; jeanneorr@resienv.com; mgoldade@peakpeak.com; 'Naresh C. Batta'; rdemalo@emsl.com; rhatfield@mastest.com; rmahoney@emsl.com; 'Shu-Chun Su'; 'William Longo'
Subject: EPA APPROVED MOD: LB-000018 (Revised 4-9-03)



pic21781.gif



LB-000018_rev (MG)
4-09-03 emai...

EPA approves the attached MOD.
(Embedded image moved to file: pic21781.gif)

"Raney, Mark"
<RANEY@VOLPE.DOT.GOV>
04/08/03 08:32 AM
brattin@syrres.com, "Garth
enviro.com>,"
To: "Beckham, Richard" <BeckhamRE@cdm.com>, 'Kyeong Corbin'
<corbin77@atc-enviro.com>
cc: "Autio, Anni" <AutioAH@cdm.com>, mgoldade@peakpeak.com,
dmazzaferro@mastest.com, Mary Goldade/EPR/R8/USEPA/US@EPA,
B. Freeman" <gfreeman@mastest.com>, 'Gustavo Delgado' <gdelgado77@atc-
'Shu-Chun Su' <scsu@delanet.com>, "Naresh C. Batta" <ncbatta@battaenv.com>,
Bob.Shumate@battaenv.com, 'Bill Egeland' <begeland@mastest.com>,
rhatfield@mastest.com, 'William Longo' <wlongo@mastest.com>, rmahoney@emsl.com,
rdemalo@emsl.com, jeanneorr@resienv.com, 'Charlie LaCerra' <clacerra@emsl.com>
Subject: Revised LB-000018,

All,

Attached is a revised copy of LB-000018. I have revised the attached to document that for the purposes of the Libby Project (since the beginning of analyzing RI samples) the NIOSH 9002 & EPA visual estimation methods are considered to be interchangeable. By documenting this, it is no longer necessary to prepare separate MODs for cases where internal Lab documentation may indicate performing PLM visual estimation via the EPA method rather than NIOSH 9002.

Please take a look at the attached and be prepared to discuss it during today's telecon.

Mark.

-----Original Message-----

From: Beckham, Richard [mailto:BeckhamRE@cdm.com]
Sent: Monday, April 07, 2003 10:45 AM
To: 'RANEY@VOLPE.DOT.GOV'
Cc: Autio, Anni
Subject: FW: Revised LB-000018, LB-000021, and LB-000023

Mr. Raney,

Do you know if the issues surrounding LB-000018 were resolved?

Thank you,
Richard Beckham

-----Original Message-----

From: Kyeong Corbin [mailto:corbin77@atc-enviro.com]

Sent: Thursday, March 27, 2003 6:04 PM

To: Beckham, Richard

Cc: mgoldade@peakpeak.com; dmazzaferro@mastest.com;

Goldade.mary@EPAMail.epa.gov; brattin@syrres.com; Raney@volpe.dot.gov;

Autio, Anni; 'Garth B. Freeman'; 'Gustavo Delgado'; 'Shu-Chun Su';

'Naresh C. Batta'; Bob.Shumate@battaenv.com; 'Bill Egeland';

rhatfield@mastest.com; 'William Longo'; rmahoney@emsl.com;

rdemalo@emsl.com; jeanneorr@resienv.com; 'Charlie LaCerra'

Subject: Revised LB-000018, LB-000021, and LB-000023

For your review and comment. These mod forms do not impact all laboratories.

I'd like to discuss LB-000018 on the next phone conference. I don't know if

it is necessary to fill out this mod form.

Kyeong Corbin
Hygeia Laboratories Inc.

(See attached file: LB-000018_rev (MG 4-09-03 email).doc)



Request for Modification

To
Laboratory Activities
LB-000019

Instructions to Requester: E-mail form to contacts at bottom of form for review and approval.

File approved copy with Data Manager (CDM). Data Manager distributes approved forms as follows:

All Labs Applicable forms – copies to: EPA, Volpe, CDM, All project labs

Individual Labs Applicable forms – copies to: EPA, Volpe, CDM, Initiating Lab

Method (circle one/those applicable): TEM-AHERA, TEM-ISO 10312, PCM-NIOSH 7400, PLM-NIOSH 9002, EPA/600/R-93/116, ASTM D5755-95, EPA/540/2-90/005a, Other: All TEM Methodologies

Requester: R. K. Mahoney

Title: Senior Analyst/Special Projects Coordinator

Company: EMSL Analytical, Inc.

Date: 21 January 2003

Description of Modification:

Clarification of bench sheet recording format for grid openings in which no countable structures are recorded.

Reason for Modification:

The electronically deliverable spread sheet for TEM analysis developed for the Libby project requires "ND" (None Detected) to be entered for grid openings in which no countable structures are recorded. The ND code has been used on all electronic deliverables for the Libby project. The code "NSD" (No Structure Detected) has been used on hand written bench sheets up until this date. As of 21 January 2003, "ND" will be used on the bench sheets as well as the electronically deliverables.

Potential Implications of this Modification:

There are no potential negative implications resulting from this clarification of terms.

Laboratory Applicability (circle one): All Individual(s) EMSL Analytical, Inc.

Duration of Modification (circle one):

Temporary Date(s): _____

Analytical Batch ID: _____

Temporary Modification Forms – Attach legible copies of approved form w/ all associated raw data packages

Permanent (Complete Proposed Modification Section)

Effective Date: 21 January 2003

Permanent Modification Forms – Maintain legible copies of approved form in a binder that can be accessed by analysts.

Proposed Modification to Method (attach additional sheets if necessary; state section and page numbers of Method when applicable):

Technical Review: R. K. Mahoney
(Laboratory Manager or designate)

Date: 27 March 2003

Project Review and Approval: Mark Raney
(Volpe: Mark Raney)

Date: 7 March 2003

Approved By: Mary Goldade

Date: 7 March 2003

Title:

EPA Regional Chemist
(USEPS: Mary Goldade)

Mahoney, Ron

From: Raney, Mark [RANEY@VOLPE.DOT.GOV]
Sent: Friday, March 07, 2003 2:50 PM
To: 'Beckham, Richard'; 'Charlie LaCerra'; 'rdemalo@emsl.com'; 'rmahoney@emsl.com'; Autio, Anni; Raney, Mark; 'brattin@syrres.com'; 'Goldade.mary@EPAmail.epa.gov'; Montera, Jeff
Subject: RE: MOD LB-000019

I find Laboratory Request for Modification # LB-000019 acceptable as written and here by provide Volpe approval to this MOD.

Richard, Please make sure MOD ID#s get inserted onto the mod forms themselves (not just the file ID), so you will be able to identify the IDs based upon hardcopy alone. Also, even though this MOD is applicable to an individual lab, all MODs are to be forwarded to all labs for informational purposes and to give them an opportunity to provide comments. All labs however are REQUIRED to provide comments to only MODs that are applicable to all labs.

Mark Raney
Environmental Engineer

US DOT / Volpe Center
Environmental Engineering Division, DTS-33
phone: 617-494-2377
cell: 617-694-8223
fax: 617-494-2789
raney@volpe.dot.gov

~~Original Message~~

From: Beckham, Richard [mailto:BeckhamRE@cdm.com]
Sent: Thursday, March 06, 2003 9:54 AM
To: 'Charlie LaCerra'; 'rdemalo@emsl.com'; 'rmahoney@emsl.com'; Autio, Anni; 'Raney@volpe.dot.gov'; 'brattin@syrres.com'; 'Goldade.mary@EPAmail.epa.gov'; Montera, Jeff
Subject: MOD LB-000019

This MOD impacts only EMSL. For your review and comment:

<<LB-000019.doc>>

- Richard Beckham

Mahoney, Ron

From: Mary Goldade [mgoldade@peakpeak.com]
Sent: Friday, March 07, 2003 12:29 PM
To: Raney, Mark
Cc: Jeff G. Montera; rmahoney@emsl.com; Autio, Anni; William Brattin; Goldade.Mary@epamail.epa.gov
Subject: Re: MOD LB-000019

I agree that this mod form is acceptable, and should be discussed on the next lab call to be certain similar issues are not encountered at other labs.

Mary

----- Original Message -----

From: "Raney, Mark" <RANEY@VOLPE.DOT.GOV>
To: "Goldade, Mary (HOME)" <mgoldade@peakpeak.com>
Sent: Friday, March 07, 2003 10:18 AM
Subject: FW: MOD LB-000019

>
> FYI
>
>
> -----Original Message-----
> **From:** Beckham, Richard [mailto:BeckhamRE@cdm.com]
> **Sent:** Thursday, March 06, 2003 9:54 AM
> **To:** 'Charlie LaCerra'; 'rdemalo@emsl.com'; 'rmahoney@emsl.com'; Autio,
> Anni; 'Raney@volpe.dot.gov'; 'brattin@syrres.com';
> 'Goldade.mary@EPAMail.epa.gov'; Montera, Jeff
> **Subject:** MOD LB-000019

>
>
> This MOD impacts only EMSL. For your review and comment:
>
> <<LB-000019.doc>>
> - Richard Beckham



Request for Modification

To
Laboratory Activities
LB-000020

Instructions to Requester: E-mail form to contacts at bottom of form for review and approval.

File approved copy with Data Manager (CDM). Data Manager distributes approved forms as follows:

All Labs Applicable forms – copies to: EPA, Volpe, CDM, All project labs

Individual Labs Applicable forms – copies to: EPA, Volpe, CDM, Initiating Lab

Method (circle one/those applicable): TEM-AHERA, TEM-ISO 10312, PCM-NIOSH 7400, PLM-NIOSH 9002, EPA/600/R-93/116, ASTM D5755-95, EPA/540/2-90/005a,

Other: EPA/600/R-94/134 (TEM Water Method 100.2)

Requester: R. K. Mahoney

Title: Senior Analyst/Special Projects Coordinator

Company: EMSL Analytical, Inc.

Date: _____

Description of Modification:

In addition to the traditional asbestos minerals, those comprising the Libby Amphibole complex will also be considered applicable analytes. All applicable analyte structures \geq or $=$ 0.5 μ m in length and a \geq or $=$ 3:1 aspect ratio will be recorded. Due to the nature of some of the samples involved, the specified analytical sensitivity may not be reached. A maximum of ten grid openings will be counted. The reporting format will be that compatible with the database developed by the Volpe Center in conjunction with the EPA Region 8 project for Libby, MT.

Reason for Modification:

Clarification of the data enumeration, recording, and reporting formats for EPA/600/R-94/134 (TEM Water Method 100.2) as they relate to the EPA Region 8 Libby, MT project.

Potential Implications of this Modification:

There are no potential negative implications resulting from this clarification of data enumeration, recording, and reporting formats.

Laboratory Applicability (circle one): ☒ All Individual(s) _____

Duration of Modification (circle one):

Temporary Date(s): _____

Analytical Batch ID: _____

Temporary Modification Forms – Attach legible copies of approved form w/ all associated raw data packages

☒ Permanent⁴² (Complete Proposed Modification Section) Effective Date: 10 April 2000

Permanent Modification Forms – Maintain legible copies of approved form in a binder that can be accessed by analysts.

Proposed Modification to Method (attach additional sheets if necessary; state section and page numbers of Method when applicable):

Technical Review: R. K. Mahoney
(Laboratory Manager or designate)

Date: 27 March 2003

Project Review and Approval: Mark Raney
(Volpe: Mark Raney)

Date: 14 March 2003

Approved By: Mary Goldade

Date: 27 March 2003

Title: EPA Regional Chemist
(USEPA: Mary Goldade)

Mahoney, Ron

From: Goldade.Mary@epamail.epa.gov
Sent: Thursday, March 27, 2003 3:46 PM
To: Mahoney, Ron
Cc: autioah@cdm.com; BeckhamRE@cdm.com; raney@voipe.dot.gov
Subject: EPA APPROVAL MOD: LB-000020 (TEM Water)



pic26201.gif

EPA approves LB-00020 w/ the addition of an effective date to the mod delivered 3-14-03
(Embedded image moved to file: pic26201.gif)

"Mahoney, Ron"
<Rmahoney@EMSL.co To: Mary Goldade/EPR/R8/USEPA/US@EPA
m> cc:
Subject: OK Needed for LB-000020 (TEM Water)
03/27/03 01:16 PM

Mary,

I need an email OK from you for the TEM water Mod before I send it in to Mark. This is the one that you were going to sign off on Monday, but we held off to be sure about the counting rules

R.K. Mahoney
Senior Analyst
Special Projects Coordinator
EMSL Analytical, Inc.
Westmont, NJ
800.220.3675, x1218
rmahoney@emsl.com

Mahoney, Ron

From: Raney, Mark [RANEY@VOLPE.DOT.GOV]
Sent: Friday, March 14, 2003 12:37 PM
To: 'Beckham, Richard'; 'Charlie LaCerra'; 'jeanneorr@resienv.com'; 'rdemalo@emsl.com'; 'rmahoney@emsl.com'; 'William Longo'; 'rhatfield@mastest.com'; 'Bill Egeland'; 'Bob.Shumate@battaenv.com'; 'Naresh C. Batta'; 'Shu-Chun Su'; 'corbin77@atc-enviro.com'; 'Gustavo Delgado'; 'Garth B. Freeman'; 'Autio, Anni'; 'Raney, Mark'; 'brattin@symes.com'; 'Goldade.mary@EPAMail.epa.gov'; 'dmazzaferro@mastest.com'; 'mgoldade@peakpeak.com'
Subject: LB-000018, 20_rev, 21, 22_rev, 23, & 24



LB-000024_rev
(3-14-03 email)....

Below are the results of my review of the following Requests for Modifications to Laboratory Activities:

LB-000018

- * Missing info, "Potential Implications of this Modification" is a required field and must be filled out even if it is to say the modification will have no implication on results, etc.
- * "Laboratory Applicability" should be "Individual" NOT "All", since it only applies to Hygeia.
- * "Duration of Modification" should be "Temporary" not "Permanent" since the modification impacted only two jobs.

LB-000020_rev

- * Looks good, I provide Volpe's approval as is.

LB-000021

- * "Laboratory Applicability" should be Individual NOT All, since it only applies to Hygeia.

LB-000022_rev

It appears this revised version was provided prior to receiving my earlier comments, which still apply (see below):

- * Under "Description of Modification" make it clear that the standards are from "ISTM2"
- * Add: when completing data entry into the EDD instead of inputting a "B" or "T" into the "Ref Material (B or T)" field of the "Visual_data entry" tab the Labs should input "ISTM"
- * Note: for this and other future TEMPORARY MODs, the MOD should not recommend proposing a written modification to the SOP (Method) itself. There is no reason to revise the method for temporary modifications.

LB-000023

- * Does this MOD also affect TEM dust results? Were any dust analysis performed by Hygeia between 6/1/02 and 11/30/02?
- * "Laboratory Applicability" should be "Individual" NOT "All", since it only applies to Hygeia.

LB-000024

See the attached revised MOD, where the following changes have been made:

- * This MOD should be a permanent, rather than a temporary MOD, since some soils may still be analyzed via NIOSH 9002 in the future, such as at the mobile lab, etc. (i.e., applicable from 12/16/2002 forward)
- * Under "Description of Modification": (1) specified reference materials as "ISTM2"; (2) specified for comparison materials for quantification "of soil samples"; and (3) clarified Bin "B2" is for <1.0% and Bin "C" is for = or > 1.0% and reported as a whole number (same Bin classifications as stated within SOP SRC-Libby-03 Rev. 0).

Please respond (reply ALL) with any questions or comments to the above points.

Mark.

<<LB-000024_rev (3-14-03 email).doc>>



Request for Modification
To
Laboratory Activities
LB-000021

Instructions to Requester: E-mail form to contacts at bottom of form for review and approval.

File approved copy with Data Manager (CDM). Data Manager distributes approved forms as follows:

All Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, All project labs

Individual Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, Initiating Lab

Method (circle one/those applicable): TEM-AHERA, TEM-ISO 10312, PCM-NIOSH 7400, PLM-NIOSH 9002,
EPA/600/R-93/116, ASTM D5755-95, EPA/540/2-90/005a, Other: TEM-EPA 600

Requester: Kyeong Corbin

Title: TEM Laboratory Supervisor

Company: Hygeia Laboratories Inc.

Date: 1-29-03

Description of Modification:

Gravimetric reductions (ashing and acid washing procedures) were not performed on 20 soil samples submitted by COC #D0049 & D0050 (Hygeia Job No. 22887030001) and COC #D0074 (Hygeia Job No. 22887030005).

Reason for Modification:

The samples were prepared without the gravimetric reduction procedures because we couldn't reduce the materials. Gravimetric reductions were attempted two times, but each time the sample weights were increasing with the reduction procedures. The samples appear to be pure quartz (gray color) with trace amount of metals.

Potential Implications of this Modification:

This modification would not affect the sample results.

Laboratory Applicability (circle one): All Individual(s) Hygeia Laboratories, Inc.

Duration of Modification (circle one):

Temporary Date(s): 1/2/03-1/10/03 and 1/22/03-1/24/03

Analytical Batch ID: Hygeia Job No. 22887030001 and 22887030005

Temporary Modification Forms – Attach legible copies of approved form w/ all associated raw data packages

☐ Permanent (complete Proposed Modification Section)

Permanent Modification Forms – Maintain legible copies of approved form in a binder that can be accessed by analysts.

Proposed Modification to Method (attach additional sheets if necessary; state section and page numbers of Method when applicable):

Technical Review: [Signature]
(Laboratory Manager or designate)

Date: 4-4-03

Project Review and Approval: Mark Raney
(Volpe: Project Technical Lead or designate)

Date: 4-4-03 3/27/03

Approved By: Mary Goldade
(USEPA: Project Chemist or designate)

Title: Project Chemist Date: 4-4-03 3/31/03

Kyeong Corbin

From: Raney, Mark [RANEY@VOLPE.DOT.GOV]
Sent: Friday, April 04, 2003 6:02 AM
To: corbin77@atc-enviro.com
Cc: Autio, Anni; Richard Beckham; 'Bill Egeland'; Bob.Shumate@battaenv.com; brattin@syrres.com; 'Charlie LaCerra'; dmazzaferro@mastest.com; 'Gustavo Delgado'; 'Garth B. Freeman'; jeanneorr@resienv.com; mgoldade@peakpeak.com; 'Naresh C. Batta'; Raney, Mark; rdemalo@emsl.com; rhatfield@mastest.com; rmahoney@emsl.com; 'Shu-Chun Su'; 'William Longo'; 'Goldade.Mary@epamail.epa.gov'
Subject: Volpe APPROVED MOD: Revised LB-000021 and LB-000023

This email confirms Volpe's approval of Revised MODs LB-000021 and LB-000023 (as provided via email 3/27/03). Please proceed with distribution of final copies for signature.

Mark.

-----Original Message-----

From: Goldade.Mary@epamail.epa.gov [mailto:Goldade.Mary@epamail.epa.gov]
Sent: Monday, March 31, 2003 11:38 AM
To: corbin77@atc-enviro.com
Cc: Autio, Anni; Richard Beckham; 'Bill Egeland'; Bob.Shumate@battaenv.com; brattin@syrres.com; 'Charlie LaCerra'; dmazzaferro@mastest.com; 'Gustavo Delgado'; 'Garth B. Freeman'; jeanneorr@resienv.com; mgoldade@peakpeak.com; 'Naresh C. Batta'; Raney@volpe.dot.gov; rdemalo@emsl.com; rhatfield@mastest.com; rmahoney@emsl.com; 'Shu-Chun Su'; 'William Longo'
Subject: EPA APPROVED MOD: Revised LB-000021 and LB-000023; DISCUSS LB-000018 AT NEXT LAB CALL

EPA approves LB-000021 & LB-000023 as attached.

I agree we should discuss mod LB-000018 tomorrow.
(Embedded image moved to file: pic26418.gif)

<p>Kyeong Corbin <corbin77@atc-enviro.com> <beckhamre@cdm.com> dmazzaferro@mastest.com, Mary brattin@syrres.com, Raney@volpe.dot.gov, "Autio, Anni" <gfreeman@mastest.com>, "Gustavo Delgado" Su' <scsu@delanet.com>, "'Naresh C. Batta'" Bob.Shumate@battaenv.com, 'Bill Egeland' rhatfield@mastest.com, 'William Longo' <wlongo@mastest.com>, jeanneorr@resienv.com, 'Charlie LaCerra'</p>	<p>To: Richard Beckham cc: mgoldade@peakpeak.com, Goldade/EPR/R8/USEPA/US@EPA, <AutioAH@cdm.com>, "'Garth B. Freeman'" <gdelgado77@atc-enviro.com>, 'Shu-Chun' <ncbatta@battaenv.com>, <begeland@mastest.com>, rmahoney@emsl.com, rdemalo@emsl.com, <clacerra@emsl.com> Subject: Revised LB-000018, LB-000021, and LB-000023</p>
--	---

For your review and comment. These mod forms do not impact all laboratories.

I'd like to discuss LB-000018 on the next phone conference. I don't know if it is necessary to fill out this mod form.

Kyeong Corbin

Hygeia Laboratories Inc.

(See attached file: LB-000018 revised.doc) (See attached file: LB-000021 revised.doc) (See attached file: LB-000023 revised.doc)



Request for Modification

To

Laboratory Activities

LB-000022

Instructions to Requester: E-mail form to contacts at bottom of form for review and approval.

File approved copy with Data Manager (CDM). Data Manager distributes approved forms as follows:

All Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, All project labs

Individual Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, Initiating Lab

Method (circle one/those applicable): TEM-AHERA, TEM-ISO 10312, PCM-NIOSH 7400, PLM-NIOSH 9002,
EPA/600/R-93/116, ASTM D5755-95, EPA/540/2-90/005a, Other: SOP SRC-Libby-03 Rev. 0

Requester: R. K. Mahoney

Title: Senior Analyst/Special Projects Coordinator

Company: EMSL Analytical, Inc.

Date: 11 March 2003

Description of Modification:

Use of only 0.2 % and 1.2 % Libby amphibole bulk standards from ISTM2 for quantification comparison in conjunction with SOP SRC-Libby-03 Rev. 0. When completing data entry into the EDD, ISTM will be entered into the "Ref Material" field.

Reason for Modification:

Bulk and permanent mount prepared slides of 0.2 % and 1.0 % Libby amphibole in both brown and tan soils, to be prepared by USGS Denver, are not yet available.

Potential Implications of this Modification:

The use of a restricted range of the proposed comparison materials may make quantification of the expected limited number of circa 1 % Libby amphibole content soil samples more difficult.

Laboratory Applicability (circle one): ☒ All Individual(s) _____

Duration of Modification (circle one):

☒ Temporary Date(s): From 3 March 2003 until bulk and permanent mount prepared slides of 0.2 % and 1.0 % Libby amphibole in both brown and tan soils are supplied to the involved laboratories by USGS, Denver.

Analytical Batch ID: _____

Temporary Modification Forms – Attach legible copies of approved form w/ all associated raw data packages

☐ Permanent (complete Proposed Modification Section) Effective Date: _____

Permanent Modification Forms – Maintain legible copies of approved form in a binder that can be accessed by analysts.

Proposed Modification to Method (attach additional sheets if necessary; state section and page numbers of Method when applicable):

Technical Review: R. K. Mahoney
(Laboratory Manager or designate)

Date: 27 March 2003

Project Review and Approval: Mark Roney
(Volpe: Mark Roney)

Date: 14 March 2003

Approved By: Mary Goldade

Date: 25 March 2003

Title: EPA Regional Chemist
(USEPA: Mary Goldade)

Mahoney, Ron

From: Goldade.Mary@epamail.epa.gov
Sent: Tuesday, March 25, 2003 10:42 AM
To: Beckham, Richard
Cc: Autio, Anni; 'Bill Egeland'; 'Bob.Shumate@battaenv.com'; 'brattin@syrres.com'; 'Charlie LaCerra'; 'corbin77@atc-enviro.com'; 'dmazzaferro@mastest.com'; 'Gustavo Delgado'; 'Garth B. Freeman'; 'jeanneorr@resienv.com'; 'Naresh C. Batta'; 'Raney@volpe.dot.gov'; 'rdemalo@emsl.com'; 'rhatfield@mastest.com'; 'rmahoney@emsl.com'; 'Shu-Chun Su'; 'William Longo'
Subject: EPA APPROVED MOD: LB-000022 (Revised)



LB-000022 .doc



pic09984.gif

The newly attached document is acceptable w/ changes. EPA approves.

(See attached file: LB-000022 .doc)

(Embedded image moved to file: pic09984.gif)

"Beckham,
Richard" To: 'Charlie LaCerra' <clacerra@emsl.com>, "jeanneorr@resienv.com"
<BeckhamRE@cdm.co <jeanneorr@resienv.com>, "rdemalo@emsl.com" <rdemalo@emsl.com>, m>
<wlongo@mastest.com>, "rmahoney@emsl.com" <rmahoney@emsl.com>, 'William Longo'
"rhatfield@mastest.com" <rhatfield@mastest.com>, 'Bill Egeland'
03/25/03 08:32 AM <begeland@mastest.com>, "Bob.Shumate@battaenv.com"
"Bob.Shumate@battaenv.com",
"Naresh C. Batta" <ncbatta@battaenv.com>, 'Shu-Chun Su' <scsu@delanet.com>,
"corbin77@atc-enviro.com" <corbin77@atc-enviro.com>, 'Gustavo Delgado'
<gdelgado77@atc-enviro.com>, "Garth B. Freeman" <gfreeman@mastest.com>, "Autio,
Anni" <AutioAH@cdm.com>, "Raney@volpe.dot.gov" <Raney@volpe.dot.gov>,
"brattin@syrres.com" <brattin@syrres.com>, Mary Goldade/EPR/R8/USEPA/US@EPA,
"dmazzaferro@mastest.com" <dmazzaferro@mastest.com>
cc:
Subject: FW: LB-000022 (Revised)

This edition did not get forwarded to the group.

- Richard Beckham

-----Original Message-----

From: Mahoney, Ron [mailto:Rmahoney@EMSL.com]
Sent: Friday, March 14, 2003 1:39 PM
To: Autio, Anni; Beckham, Richard
Subject: FW: LB-000022 (Revised)

Revised as per Mark's comments of 14 March 2003.

Mahoney
Senior Analyst
Special Projects Coordinator
EMSL Analytical, Inc.

Mahoney, Ron

From: Raney, Mark [RANEY@VOLPE.DOT.GOV]
Sent: Friday, March 14, 2003 12:37 PM
To: 'Beckham, Richard'; 'Charlie LaCerra'; 'jeanneorr@resienv.com'; 'rdemalo@emsl.com'; 'rmahoney@emsl.com'; 'William Longo'; 'rhatfield@mastest.com'; 'Bill Egeland'; 'Bob.Shumate@battaenv.com'; 'Naresh C. Batta'; 'Shu-Chun Su'; 'corbin77@atc-enviro.com'; 'Gustavo Delgado'; 'Garth B. Freeman'; 'Autio, Anni'; 'Raney, Mark'; 'brattin@syrres.com'; 'Goldade.mary@EPAMail.epa.gov'; 'dmazzaferro@mastest.com'; 'mgoldade@peakpeak.com'
Subject: LB-000018, 20_rev, 21, 22_rev, 23, & 24



LB-000024_rev
(3-14-03 email)....

Below are the results of my review of the following Requests for Modifications to Laboratory Activities:

LB-000018

- * Missing info, "Potential Implications of this Modification" is a required field and must be filled out even if it is to say the modification will have no implication on results, etc.
- * "Laboratory Applicability" should be "Individual" NOT "All", since it only applies to Hygeia.
- * Duration of Modification" should be "Temporary" not "Permanent" since the modification impacted only two jobs.

LB-000020_rev

- * Looks good, I provide Volpe's approval as is.

LB-000021

- * "Laboratory Applicability" should be Individual NOT All, since it only applies to Hygeia.

LB-000022_rev

It appears this revised version was provided prior to receiving my earlier comments, which still apply (see below):

- * Under "Description of Modification" make it clear that the standards are from "ISTM2"
- * Add: when completing data entry into the EDD instead of inputting a "B" or "T" into the "Ref Material (B or T)" field of the "Visual_data entry" tab the Labs should input "ISTM"
- * Note: for this and other future TEMPORARY MODs, the MOD should not recommend proposing a written modification to the SOP (Method) itself. There is no reason to revise the method for temporary modifications.

LB-000023

- * Does this MOD also affect TEM dust results? Were any dust analysis performed by Hygeia between 6/1/02 and 11/30/02?
- * "Laboratory Applicability" should be "Individual" NOT "All", since it only applies to Hygeia.

LB-000024

See the attached revised MOD, where the following changes have been made:

- * This MOD should be a permanent, rather than a temporary MOD, since some soils may still be analyzed via NIOSH 9002 in the future, such as at the mobile lab, etc. (i.e., applicable from 12/16/2002 forward)
- * Under "Description of Modification": (1) specified reference materials as "ISTM2"; (2) specified for comparison materials for quantification "of soil samples"; and (3) clarified Bin "B2" is for <1.0% and Bin "C" is for = or > 1.0% and reported as a whole number (same Bin classifications as stated within SOP SRC-Libby-03 Rev. 0).

Please respond (reply ALL) with any questions or comments to the above points.

Mark.

<<LB-000024_rev (3-14-03 email).doc>>



Request for Modification

To
Laboratory Activities
LB-000023

Instructions to Requester: E-mail form to contacts at bottom of form for review and approval.

File approved copy with Data Manager (CDM). Data Manager distributes approved forms as follows:

All Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, All project labs

Individual Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, Initiating Lab

Method (circle one/those applicable): TEM-AHERA, TEM-ISO 10312, PCM-NIOSH 7400, PLM-NIOSH 9002,
EPA/600/R-93/116, ASTM D5755-95, EPA/540/2-90/005a, Other: _____

Requester: Kyeong Corbin

Title: TEM Laboratory Supervisor

Company: Hygeia Laboratories Inc.

Date: 1-14-03

Description of Modification:

Hygeia recorded all "ND" data as "NSD" for air and dust sample analyses.

Reason for Modification:

Unawareness of the project specific requirement for "ND" nomenclature

Potential Implications of this Modification:

The modification may cause difficulty in electronic data uploading.

Laboratory Applicability (circle one): All

Individual(s) Hygeia Laboratories Inc.

Duration of Modification (circle one):

Temporary Date(s): 6/1/02 to 11/30/02

Analytical Batch ID: 22887020002 to 22887020063 excluding PLM and PCM data batch

Temporary Modification Forms – Attach legible copies of approved form w/ all associated raw data packages

Permanent ☐ (complete Proposed Modification Section)

Permanent Modification Forms – Maintain legible copies of approved form in a binder that can be accessed by analysts.

Proposed Modification to Method (attach additional sheets if necessary; state section and page numbers of Method when applicable):

Technical Review: [Signature]
(Laboratory Manager or designate)

Date: 4-4-03

Project Review and Approval: Mark Raney
(Volpe: Project Technical Lead or designate)

Date: 4-4-03

Approved By: Mary Goldade
(USEPA: Project Chemist or designate)

Title: Project Chemist

Date: 4-4-03

Kyeong Corbin

From: Raney, Mark [RANEY@VOLPE.DOT.GOV]
Sent: Friday, April 04, 2003 6:02 AM
To: corbin77@atc-enviro.com
Cc: Autio, Anni; Richard Beckham; 'Bill Egeland'; Bob.Shumate@battaenv.com; brattin@syrrs.com; 'Charlie LaCerra'; dmazzaferro@mastest.com; 'Gustavo Delgado'; 'Garth B. Freeman'; jeanneorr@resienv.com; mgoldade@peakpeak.com; 'Naresh C. Batta'; Raney, Mark; rdemalo@emsl.com; rhatfield@mastest.com; rmahoney@emsl.com; 'Shu-Chun Su'; 'William Longo'; Goldade.Mary@epamail.epa.gov
Subject: Volpe APPROVED MOD: Revised LB-000021 and LB-000023

This email confirms Volpe's approval of Revised MODs LB-000021 and LB-000023 (as provided via email 3/27/03). Please proceed with distribution of final copies for signature.

Mark.

-----Original Message-----

From: Goldade.Mary@epamail.epa.gov [mailto:Goldade.Mary@epamail.epa.gov]
Sent: Monday, March 31, 2003 11:38 AM
To: corbin77@atc-enviro.com
Cc: Autio, Anni; Richard Beckham; 'Bill Egeland'; Bob.Shumate@battaenv.com; brattin@syrrs.com; 'Charlie LaCerra'; dmazzaferro@mastest.com; 'Gustavo Delgado'; 'Garth B. Freeman'; jeanneorr@resienv.com; mgoldade@peakpeak.com; 'Naresh C. Batta'; Raney@volpe.dot.gov; rdemalo@emsl.com; rhatfield@mastest.com; rmahoney@emsl.com; 'Shu-Chun Su'; 'William Longo'
Subject: EPA APPROVED MOD: Revised LB-000021 and LB-000023; DISCUSS
LB-000018 AT NEXT LAB CALL

EPA approves LB-000021 & LB-000023 as attached.

I agree we should discuss mod LB-000018 tomorrow.
(Embedded image moved to file: pic26418.gif)

Kyeong Corbin
<corbin77@atc-enviro.com>
<beckhamre@cdm.com>
dmazzaferro@mastest.com, Mary
brattin@syrrs.com, Raney@volpe.dot.gov, "Autio, Anni"
03/27/03 04:03 PM
<gfreeman@mastest.com>, 'Gustavo Delgado'
Please respond to
Su' <scsu@delanet.com>, "'Naresh C. Batta'"
corbin77
Bob.Shumate@battaenv.com, 'Bill Egeland'
rhatfield@mastest.com, 'William Longo' <wlongo@mastest.com>,
jeanneorr@resienv.com, 'Charlie LaCerra'
To: Richard Beckham
cc: mgoldade@peakpeak.com,
Goldade/EPR/R8/USEPA/US@EPA,
<AutioAH@cdm.com>, "'Garth B. Freeman'"
<gdelgado77@atc-enviro.com>, 'Shu-Chun'
<ncbatta@battaenv.com>,
<begeland@mastest.com>,
rmahoney@emsl.com, rdemalo@emsl.com,
<clacerra@emsl.com>
Subject: Revised LB-000018, LB-000021, and
LB-000023

For your review and comment. These mod forms do not impact all laboratories.

I'd like to discuss LB-000018 on the next phone conference. I don't know if it is necessary to fill out this mod form.

Kyeong Corbin

Hygeia Laboratories Inc.

(See attached file: LB-000018 revised.doc) (See attached file: LB-000021 revised.doc) (See attached file: LB-000023 revised.doc)



Request for Modification

To

Laboratory Activities

LB-000024

Instructions to Requester: E-mail form to contacts at bottom of form for review and approval.

File approved copy with Data Manager (CDM). Data Manager distributes approved forms as follows:

All Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, All project labs

Individual Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, Initiating Lab

Method (circle one/those applicable): TEM-AHERA, TEM-ISO 10312, PCM-NIOSH 7400, PLM-NIOSH 9002,
EPA/600/R-93/116, ASTM D5755-95, EPA/540/2-90/005a, Other: _____

Requester: R. K. Mahoney Title: Senior Analyst/Special Projects Coordinator

Company: EMSL Analytical, Inc. Date: 13 March 2003

Description of Modification:

In addition to the traditional asbestos minerals, those comprising the Libby Amphibole complex will also be considered applicable analytes. As of December 16, 2002 samples of 0.2 % and 1.2 % by weight Libby amphibole bulk reference materials, prepared by the USGS, Denver (for use during ISTM2), are used as comparison materials for quantification of soil samples. Also, results will be categorized into four bins: "A" None Detected, "B1" asbestos detected but determined to be $\leq 0.2\%$, "B2" asbestos detected but determined to be $> 0.2\%$ and $\leq 1.0\%$, and "C" = or $> 1.0\%$. Results will be reported as "A" – None Detected, "B1" – Trace, "B2" – $< 1.0\%$, and "C" – will be reported as a whole number percent.

Reason for Modification:

This modification has been implemented to facilitate the more precise quantification of the relatively low levels of Libby amphibole found in soil samples from the Libby, MT site.

Potential Implications of this Modification:

There are no potential negative implications resulting from this clarification of data enumeration, recording, and reporting formats.

Laboratory Applicability (circle one): ☒ All Individual(s) _____

Duration of Modification (circle one):

Temporary Date(s): _____

Analytical Batch ID: _____

Temporary Modification Forms – Attach legible copies of approved form w/ all associated raw data packages

☒ Permanent (complete Proposed Modification Section) Effective Date: December 16, 2002

Permanent Modification Forms – Maintain legible copies of approved form in a binder that can be accessed by analysts.

Proposed Modification to Method (attach additional sheets if necessary; state section and page numbers of Method when applicable):

Technical Review: R. K. Mahoney Date: 27 March 2003
(Laboratory Manager or designate)

Project Review and Approval:
(Volpe: Mark Raney)

Mark Raney

Date: 14 March 2003

Approved By:

Mary Goldade
(USEPA: Mary Goldade)

Title:

EPA

Regional Chief

Date: 25 March 2003

Mahoney, Ron

From: Goldade.Mary@epamail.epa.gov
Sent: Tuesday, March 25, 2003 11:09 AM
To: Beckham, Richard
Cc: Autio, Anni; 'Bill Egeland'; 'Bob.Shumate@battaenv.com'; 'brattin@syrres.com'; 'Charlie LaCerra'; 'corbin77@atc-enviro.com'; 'dmazzaferro@mastest.com'; 'Gustavo Delgado'; 'Garth B. Freeman'; 'jeanneorr@resienv.com'; 'mgoldade@peakpeak.com'; 'Naresh C. Batta'; 'Raney@volpe.dot.gov'; 'rdemalo@emsl.com'; 'rhatfield@mastest.com'; 'rmahoney@emsl.com'; 'Shu-Chun Su'; 'William Longo'
Subject: EPA APPROVED MOD: LB-000024



LB-000024_rev
(3-25-03 email)....



pic19067.gif

The newly attached document is acceptable w/ changes. EPA approves.
(See attached file: LB-000024_rev (3-25-03 email).doc)
(Embedded image moved to file: pic19067.gif)

"Beckham,
Richard" To: 'Charlie LaCerra' <clacerra@emsl.com>, "jeanneorr@resienv.com"
<BeckhamRE@cdm.co <jeanneorr@resienv.com>, "rdemalo@emsl.com" <rdemalo@emsl.com>, m>
<wlongo@mastest.com>, "rmahoney@emsl.com" <rmahoney@emsl.com>, 'William Longo'
"rhatfield@mastest.com" <rhatfield@mastest.com>, 'Bill Egeland'
03/14/03 08:30 AM <begeland@mastest.com>, "Bob.Shumate@battaenv.com"
"Bob.Shumate@battaenv.com",
"Naresh C. Batta" <ncbatta@battaenv.com>, 'Shu-Chun Su' <scsu@delanet.com>,
"corbin77@atc-enviro.com" <corbin77@atc-enviro.com>, 'Gustavo Delgado'
<gdelgado77@atc-enviro.com>, "Garth B. Freeman" <gfreeman@mastest.com>, "Autio,
Anni" <AutioAH@cdm.com>, "Raney@volpe.dot.gov" <Raney@volpe.dot.gov>,
"brattin@syrres.com" <brattin@syrres.com>, Mary Goldade/EPR/R8/USEPA/US@EPA,
"dmazzaferro@mastest.com" <dmazzaferro@mastest.com>,
"mgoldade@peakpeak.com" <mgoldade@peakpeak.com>
cc:
Subject: LB-000024

This MOD impacts all labs. For your review and comment:

<<LB-000024.doc>>
- Richard Beckham

Mahoney, Ron

From: Raney, Mark [RANEY@VOLPE.DOT.GOV]
Sent: Friday, March 14, 2003 12:37 PM
To: 'Beckham, Richard'; 'Charlie LaCerra'; 'jeanneorr@resienv.com'; 'rdemalo@emsl.com'; 'rmahoney@emsl.com'; 'William Longo'; 'rhatfield@mastest.com'; 'Bill Egeland'; 'Bob.Shumate@battaenv.com'; 'Naresh C. Batta'; 'Shu-Chun Su'; 'corbin77@atc-enviro.com'; 'Gustavo Delgado'; 'Garth B. Freeman'; 'Autio, Anni'; 'Raney, Mark'; 'brattin@syrres.com'; 'Goldade.mary@EPAMail.epa.gov'; 'dmazzaferro@mastest.com'; 'mgoldade@peakpeak.com'
Subject: LB-000018, 20_rev, 21, 22_rev, 23, & 24



LB-000024_rev
(3-14-03 email)....

Below are the results of my review of the following Requests for Modifications to Laboratory Activities:

LB-000018

- * Missing info, "Potential Implications of this Modification" is a required field and must be filled out even if it is to say the modification will have no implication on results, etc.
- * "Laboratory Applicability" should be "Individual" NOT "All", since it only applies to Hygeia.
- * Duration of Modification" should be "Temporary" not "Permanent" since the modification impacted only two jobs.

LB-000020_rev

- * Looks good, I provide Volpe's approval as is.

LB-000021

- * "Laboratory Applicability" should be Individual NOT All, since it only applies to Hygeia.

LB-000022_rev

It appears this revised version was provided prior to receiving my earlier comments, which still apply (see below):

- * Under "Description of Modification" make it clear that the standards are from "ISTM2"
- * Add: when completing data entry into the EDD instead of inputting a "B" or "T" into the "Ref Material (B or T)" field of the "Visual_data entry" tab the Labs should input "ISTM"
- * Note: for this and other future TEMPORARY MODs, the MOD should not recommend proposing a written modification to the SOP (Method) itself. There is no reason to revise the method for temporary modifications.

LB-000023

- * Does this MOD also affect TEM dust results? Were any dust analysis performed by Hygeia between 6/1/02 and 11/30/02?
- * "Laboratory Applicability" should be "Individual" NOT "All", since it only applies to Hygeia.

LB-000024

See the attached revised MOD, where the following changes have been made:

- * This MOD should be a permanent, rather than a temporary MOD, since some soils may still be analyzed via NIOSH 9002 in the future, such as at the mobile lab, etc. (i.e., applicable from 12/16/2002 forward)
- * Under "Description of Modification": (1) specified reference materials as "ISTM2"; (2) specified for comparison materials for quantification "of soil samples"; and (3) clarified Bin "B2" is for <1.0% and Bin "C" is for = or > 1.0% and reported as a whole number (same Bin classifications as stated within SOP SRC-Libby-03 Rev. 0).

Please respond (reply ALL) with any questions or comments to the above points.

Mark.

<<LB-000024_rev (3-14-03 email).doc>>

Mary Goldade

05/13/03 10:34 AM

To: Anni Autio, Richard Beckham

cc: Mark Raney

cc:

Subject: Lab Mods 1-14, 18, 21, 23 in the mail

Please keep an eye out for the originals for these mods. They're in the mail.

Mary Goldade

Regional Superfund Chemist



U.S. Environmental Protection Agency, Region 8

999 19th Street, Suite 300

Mail Code: BEPR-PS

Denver, CO 80202

Phone: (303) 312-7024

Fax: (303) 312-6065

email: goldade.mary@epa.gov



Request for Modification
To
Laboratory Activities
LB-000025

Instructions to Requester: E-mail form to contacts at bottom of form for review and approval.

File approved copy with Data Manager (CDM). Data Manager distributes approved forms as follows:

All Labs Applicable forms – copies to: EPA, Volpe, CDM, All project labs

Individual Labs Applicable forms – copies to: EPA, Volpe, CDM, Initiating Lab

Method (circle one/those applicable): TEM-AHERA, TEM-ISO 10312, PCM-NIOSH 7400, PLM-NIOSH 9002, EPA/600/R-93/116, ASTM D5755-95, EPA/540/2-90/005a, Other: _____

Requester: R. K. Mahoney Title: Senior Analyst/Special Projects Coordinator

Company: EMSL Analytical, Inc. Date: 13 May 2003

Description of Modification:

For a very limited number of samples, extremely long fibers that crossed the graticle periphery twice were included in the structure enumeration.

Reason for Modification:

Until 17 September 2002, extremely long fibers that crossed the graticle periphery twice were included in the structure enumeration at the behest of Chris Weis. In the 17 September 2002 teleconference call the final decision to not enumerate these fibers was made. Personnel at the EMSL Mobile Laboratory were made aware of the change in counting protocol on 2 May 2003.

Potential Implications of this Modification:

For those limited number of samples involved, there would be a marginal elevation of the reported PCM loading and concentration results.

Laboratory Applicability (circle one): All ☒ Individual(s) EMSL Analytical, Inc., Mobile Laboratory

Duration of Modification (circle one):

☒ Temporary Date(s): 17 September 2002 to 2 May 2003

Analytical Batch ID: _____

Temporary Modification Forms – Attach legible copies of approved form w/ all associated raw data packages

Permanent (Complete Proposed Modification Section) Effective Date: _____

Permanent Modification Forms – Maintain legible copies of approved form in a binder that can be accessed by analysts.

Proposed Modification to Method (attach additional sheets if necessary; state section and page numbers of Method when applicable): _____

Technical Review: R. K. Mahoney EMSL Date: 22 July 2003
(Laboratory Manager or designate)

Project Review and Approval: [Signature] Date: 6/18/2003
(Volpe: Project Technical Lead or designate)

Approved By: [Signature] Date: 6/24/03

Title: Project Chemist
(USEPA: Project Chemist or designate)

Mahoney, Ron

From: Raney, Mark [RANEY@VOLPE.DOT.GOV]
Sent: Friday, July 18, 2003 7:53 AM
To: 'Beckham, Richard'; Autio, Anni
Cc: 'Goldade, Mary'; 'Goldade, Mary (HOME)'; 'Orr, Jeaane at Reservoir Env'; 'Mahoney, Ron'; 'Demalo, Rob (EMSL)'; 'LaCerra, Charles'
Subject: MODs: LB-000025, 26, 27 & 28



B-000025_rev (MG
6-04-03 email...



LB-000027 (MG
6-24-03).doc



LB-000028 (MG
6-24-03).doc

Richard,

LB-000025 (EMSL): Volpe provided approval (with revisions) on 6/18/03 & EPA approved on 5/14/03 (see emails and attachment below). I have yet to see a final version for signature. EMSL should finalize, sign and distribute for signature.

LB-000026 (EMSL): Approved and signed by both Volpe and EPA.

LB-000027 (RESI): MOD provided on 6/23/03 via Richard Beckham, Approved by EPA (with revisions) on 6/24/03. Volpe concurs with EPA and herby provides approval with EPA's revisions (see attached). RESI should finalize, sign and distribute for signature.

LB-000028 (EMSL): MOD provided on 6/23/03 via Richard Beckham, Approved by EPA (with revisions) on 6/24/03. Volpe concurs with EPA and herby provides approval with EPA's revisions (see attached). EMSL should finalize, sign and distribute for signature.

Please let me know if anyone has any questions.

Mark.

-----Original Message-----

From: Beckham, Richard [mailto:BeckhamRE@cdm.com]
Sent: Wednesday, July 16, 2003 5:30 PM
To: 'RANEY@VOLPE.DOT.GOV'; Autio, Anni
Subject: MOD Status

For MODs 27 and 28, I have email approvals from EPA, but have not been able to locate approvals from Volpe. CDM received a hardcopy of 27 with an original signature from RESI, that was subsequently forwarded to Volpe on 7/8/3. (Did I miss an approval email?) To my knowledge, a hardcopy of 28

has not been prepared.

- Richard Beckham

-----Original Message-----

From: Raney, Mark
Sent: Wednesday, June 18, 2003 10:56 AM
To: 'Mahoney, Ron'
Cc: 'Anni Autio'; 'Mary Goldade'
Subject: RE: EPA Markups: MOD LB-000025

Ron,

I concur with Mary's comments below. I provide Volpe's approval for MOD LB-000025 with Mary's changes and the addition of an estimate of the number of samples involved (i.e., < 20).

Thanks,

Mark.

-----Original Message-----

From: Mahoney, Ron [mailto:Rmahoney@EMSL.com]
Sent: Wednesday, June 04, 2003 9:27 AM
To: 'Mark Raney'
Cc: 'Anni Autio'; 'Mary Goldade'; CDM STAFF
Subject: FW: EPA Markups: MOD LB-000025

Mark,

Do you have any other comments for this mod? Mary asked for an estimate of the number of samples involved, and we agreed on < 20. The number is more likely < 10, but we've decided to err on the conservative side.

If I can get your input, we can put this one to bed.

R.K. Mahoney
Senior Analyst
Special Projects Coordinator
EMSL Analytical, Inc.
Westmont, NJ
800.220.3675, x1218
rmahoney@emsl.com

-----Original Message-----

From: Mary Goldade [mailto:mgoldade@peakpeak.com]
Sent: Wednesday, May 14, 2003 6:32 PM
To: Beckham, Richard; 'Charlie LaCerra'; jeanneorr@resienv.com;
rdemalo@emsl.com; rmahoney@emsl.com; 'William Longo';
chatfield@mastest.com; 'Bill Egeland'; Bob.Shumate@battaenv.com; 'Naresh
C. Batta'; 'Shu-Chun Su'; corbin77@atc-enviro.com; 'Gustavo Delgado';
'Garth B. Freeman'; Autio, Anni; Raney@volpe.dot.gov;
brattin@syrres.com; Goldade.mary@EPAmail.epa.gov;
dmazzaferro@mastest.com; m_szynskie@resienv.com

Subject: EPA Markups: MOD LB-000025

Suggested changes to the MOD are attached.

Do you already have in hand an estimate regarding the actual number of samples this affects (i.e., are you able to quantify the term "few/limited"?)

Thanks,
Mary

----- Original Message -----

From: "Beckham, Richard" <BeckhamRE@cdm.com>
To: "'Charlie LaCerra'" <clacerra@emsl.com>; <jeanneorr@resienv.com>; <rdemalo@emsl.com>; <rmahoney@emsl.com>; "'William Longo'" <wlongo@mastest.com>; <rhatfield@mastest.com>; "'Bill Egeland'" <begeland@mastest.com>; <Bob.Shumate@battaenv.com>; "'Naresh C. Batta'" <ncbatta@battaenv.com>; "'Shu-Chun Su'" <scsu@delanet.com>; <corbin77@atc-enviro.com>; "'Gustavo Delgado'" <gdelgado77@atc-enviro.com>; <Garth B. Freeman" <gfreeman@mastest.com>; "Autio, Anni" <AutioAH@cdm.com>; <Raney@volpe.dot.gov>; <brattin@syrres.com>; <Goldade.mary@EPAmail.epa.gov>; <dmazzaferro@mastest.com>; <mgoldade@peakpeak.com>; <m_szynskie@resienv.com>
Sent: Wednesday, May 14, 2003 3:28 PM
Subject: MOD LB-000025

> This MOD impacts only EMSL. For your review and comment:
>
> <<LB-000025.doc>>
> - Richard Beckham

><<LB-000025_rev (MG 6-04-03 email).doc>> <<LB-000027 (MG 6-24-03).doc>> <<LB-000028 (MG 6-24-03).doc>>
>
>
>



Request for Modification

To
Laboratory Activities
LB-000026

**Instructions to Requester: E-mail form to contacts at bottom of form for review and approval.
File approved copy with Data Manager (CDM). Data Manager distributes approved forms as follows:**

All Labs Applicable forms – copies to: EPA, Volpe, CDM, All project labs

Individual Labs Applicable forms – copies to: EPA, Volpe, CDM, Initiating Lab

Method (circle one/those applicable): TEM-AHERA, TEM-ISO 10312, PCM-NIOSH 7400, PLM-NIOSH 9002,
EPA/600/R-93/116, ASTM D5755-95, EPA/540/2-90/005a,

Other: EPA/600/R-94/134 (TEM Water Method 100.2)

Requester: R. K. Mahoney

Title: Senior Analyst/Special Projects Coordinator

Company: EMSL Analytical, Inc.

Date: 4 June 2003

Description of Modification:

Only asbestos structures (including Libby Amphiboles) > 10 µm in length and 3:1 aspect ratio were counted.

Reason for Modification:

These samples were analyzed prior to the decision to count all asbestos structures (including Libby Amphiboles) greater than or equal to 0.5 µm in length and a 3:1 aspect ratio as specified in LB-000020.

Potential Implications of this Modification:

Calculated analyte concentrations could potentially be lower in the samples in which only structures > 10 µm in length and 3:1 aspect ratio were counted as opposed to the results obtained if the same samples were counted in accordance with LB-000020.

Laboratory Applicability (circle one): All

Individual(s) EMSL Analytical, Inc

Duration of Modification (circle one):

Temporary

Date(s): 15 August 2001

Analytical Batch ID: 040113160 (EPA sample numbers 1R-05337, 1R-05339, 1R-06024, 1R-06026, and 1R-06027)

Temporary Modification Forms – Attach legible copies of approved form w/ all associated raw data packages

Permanent (Complete Proposed Modification Section) Effective Date: _____

Permanent Modification Forms – Maintain legible copies of approved form in a binder that can be accessed by analysts.

Proposed Modification to Method (attach additional sheets if necessary; state section and page numbers of Method when applicable):

Technical Review: _____

R. K. Mahoney
(Laboratory Manager or designate)

Date: 1 July 2003

Project Review and Approval: _____

Mark Baney
(Volpe: Mark Baney)

Date: 6/18/2003

Approved By: _____

Mary Goldade

Date: 6/12/2003

Title: _____

Project Chemist

(USEPA: Mary Goldade)

TRANSMISSION REPORT

PAGE : 001
TIME : JUL-21-03 08:14AM
TEL NUMBER1: 6174528000
NAME : CDM CAMBRIDGE

NBR.	FILE NBR	DATE	TIME	DURATION	PGS	TO	DEPT NBR	ACCOUNT	MODE	STATUS
270	955	JUL-21	08:13AM	00/32	001	96174528320	01		EC 502	OK

From: Autio, Anni <AutioAH@cdm.com>
To: 'EMSL Mobile Lab - Asbestos' <mobileasbestoslab@emsl.com>
Date: Thursday, June 19, 2003 2:31 PM
Subject: FW: EPA Approved: MOD LB-000026

-----Original Message-----

From: Raney, Mark [mailto:RANEY@VOLPE.DOT.GOV]
Sent: Wednesday, June 18, 2003 11:26 AM
To: 'Goldade.Mary@epamail.epa.gov'; Beckham, Richard
Cc: Autio, Anni; 'Bill Egeland'; 'Bob.Shumate@battaenv.com';
 'brattin@syrres.com'; 'Charlie LaCerra'; 'corbin77@atc-enviro.com';
 'dmazzaferro@mastest.com'; 'Gustavo Delgado'; 'Garth B. Freeman';
 'jeanneorr@resienv.com'; 'mgoldade@peakpeak.com'; 'm_szynskie@resienv.com';
 'Naresh C. Batta'; Raney, Mark; 'rdemalo@emsl.com'; 'rhatfield@mastest.com';
 'rmahoney@emsl.com'; 'Shu-Chun Su'; 'William Longo'
Subject: RE: EPA Approved: MOD LB-000026

Volpe approves MOD LB-000026 as attached. The attached version has been revised to have the applicable method section reference the EPA/600/R-94/134 (TEM Water Method 100.2) method, rather than MOD LB-000020. Let me know if you have any questions.

Mark.

Mark Raney
 Environmental Engineer

US DOT / Volpe Center
 Environmental Engineering Division, DTS-33
 phone: 617-494-2377
 cell: 617-694-8223
 fax: 617-494-2789
raney@volpe.dot.gov

-----Original Message-----

From: Goldade.Mary@epamail.epa.gov [mailto:Goldade.Mary@epamail.epa.gov]
Sent: Thursday, June 12, 2003 2:46 PM
To: Beckham, Richard
Cc: Autio, Anni; 'Bill Egeland'; 'Bob.Shumate@battaenv.com';
 'brattin@syrres.com'; 'Charlie LaCerra'; 'corbin77@atc-enviro.com';
 'dmazzaferro@mastest.com'; 'Gustavo Delgado'; 'Garth B. Freeman';
 'jeanneorr@resienv.com'; 'mgoldade@peakpeak.com';
 'm_szynskie@resienv.com'; 'Naresh C. Batta'; 'Raney@volpe.dot.gov';
 'rdemalo@emsl.com'; 'rhatfield@mastest.com'; 'rmahoney@emsl.com';

7/3/2003

'Shu-Chun Su'; 'William Longo'
 Subject: EPA Approved: MOD LB-000026

EPA approves this mod form as written.
 (Embedded image moved to file: pic23955.gif)

"Beckham,

Richard" To: 'Charlie LaCerra'
 <clacerra@emsl.com>, 'Charlie LaCerra' <clacerra@emsl.com>,
 <BeckhamRE@cdm.co "jeanneorr@resienv.com"
 <jeanneorr@resienv.com>, "rdemalo@emsl.com"
 m> <rdemalo@emsl.com>,
 "rmahoney@emsl.com" <rmahoney@emsl.com>, 'William Longo'
 <wlongo@mastest.com>,
 "rhatfield@mastest.com" <rhatfield@mastest.com>, 'Bill
 06/09/03 09:20 AM Egeland'
 <begeland@mastest.com>, "Bob.Shumate@battaenv.com"
 <Bob.Shumate@battaenv.com>,
 "Naresh C. Batta" <ncbatta@battaenv.com>, 'Shu-Chun Su'
 <scsu@delanet.com>,
 "corbin77@atc-enviro.com" <corbin77@atc-enviro.com>, 'Gustavo
 Delgado'
 <gdelgado77@atc-enviro.com>, "Garth B. Freeman" <gfreeman@mastest.com>,
 "Autio, Anni"
 <AutioAH@cdm.com>, "Raney@volpe.dot.gov" <Raney@volpe.dot.gov>,
 "brattin@syrres.com"
 <brattin@syrres.com>, Mary Goldade/EPR/R8/USEPA/US@EPA,
 "dmazzaferro@mastest.com"
 <dmazzaferro@mastest.com>, "mgoldade@peakpeak.com"
 <mgoldade@peakpeak.com>,
 "m_szynskie@resienv.com" <m_szynskie@resienv.com>
 cc:

Subject: MOD LB-000026

> This MOD impacts only EMSL. For your review and comment:

7/3/2003

>
> <<LB-000026.doc>>
> - Richard Beckham
>
>

(See attached file: LB-000026.doc)

7/3/2003

Mary Goldade

07/14/03 04:32 PM

To: Anni Autio, Richard Beckham

cc: raney@volpe.dot.gov; mraney@adelphia.net (HOME)

Subject: LB-000026 is signed and mailed

Anni & Richard,

I have mail you the original copy of the mod LB-000026.

What is the status of LB-000027 & LB-000028?

Thanks,

Mary Goldade

Regional Superfund Chemist



U.S. Environmental Protection Agency, Region 8

999 19th Street, Suite 300

Mail Code: 8EPR-PS

Denver, CO 80202

Phone: (303) 312-7024

Fax: (303) 312-6065

email: goldade.mary@epa.gov



Request for Modification
To
Laboratory Activities
LB-000027

Instructions to Requester: E-mail form to contacts at bottom of form for review and approval.

File approved copy with Data Manager (CDM). Data Manager distributes approved forms as follows:

All Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, All project labs

Individual Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, Initiating Lab

Method (circle one/those applicable): TEM-AHERA, TEM-ISO 10312, PCM-NIOSH 7400, PLM-NIOSH 9002,
EPA/600/R-93/116, ASTM D5755-95, EPA/540/2-90/005a, Other: TEM Water 100.2 EPA/600/R-94/134

Requester: Jeanne Spencer Orr

Title: President

Company: Reservoirs Environmental, Inc.

Date: 5/28/2003

Description of Modification:

In addition to the traditional asbestos minerals, those comprising the Libby Amphibole complex will also be considered applicable analytes. All applicable analyte structures $\geq 0.5\mu\text{m}$ in length and a $\geq 3:1$ aspect ratio will be recorded. Due to the nature of some of the samples involved, the specified analytical sensitivity may not be reached. A maximum of ten grid openings will be counted. The reporting format will be that compatible with the database developed by the Volpe Center in conjunction with the EPA Region 8 project for Libby, MT.

Reason for Modification:

Clarification of the data enumeration, recording, and reporting formats for EPA/600/R-94/134 (TEM Water Method 100.2) as they relate to the EPA Region 8 Libby, MT project.

Potential Implications of this Modification:

There are no potential negative implications resulting from this clarification of data enumeration, recording and reporting formats.

Laboratory Applicability (circle one): All

☒ Individual(s)

Regarding Samples 1-01224, 1-01225 and 1-

01226 RES Job #68278

Duration of Modification (circle one):

☒ Temporary

Date(s): Start of Libby, MT Project through April 10, 2000

Analytical Batch ID: _____

Temporary Modification Forms – Attach legible copies of approved form w/ all associated raw data packages

Permanent ☐ (complete Proposed Modification Section)

Permanent Modification Forms – Maintain legible copies of approved form in a binder that can be accessed by analysts.

Proposed Modification to Method (attach additional sheets if necessary; state section and page numbers of Method when applicable):

Technical Review: Jeanne Orr

(Laboratory Manager or designate)

Date: 6/24/03

Project Review and Approval: [Signature]

(Volpe: Project Technical Lead or designate)

Date: 7/18/03

Approved By: [Signature]

(USEPA: Project Chemist or designate)

Date: 6/24/03

M Szynskie

From: <Goldade.Mary@epamail.epa.gov>
To: "Beckham, Richard" <BeckhamRE@cdm.com>
Cc: "Autio, Anni" <AutioAH@cdm.com>; "Beckham, Richard" <BeckhamRE@cdm.com>; "Bill Egeland" <begeland@mastest.com>; <Bob.Shumate@battaenv.com>; <brattin@syrres.com>; "Charlie LaCerra" <clacerra@emsl.com>; <corbin77@atc-enviro.com>; <dmazzaferro@mastest.com>; "Gustavo Delgado" <gdelgado77@atc-enviro.com>; "Garth B. Freeman" <gfreeman@mastest.com>; <jeanneorr@resienv.com>; <mgoldade@peakpeak.com>; <m_szynskie@resienv.com>; "Naresh C. Batta" <ncbatta@battaenv.com>; <Raney@volpe.dot.gov>; <rdemalo@emsl.com>; <rhatfield@mastest.com>; <rmahoney@emsl.com>; "Shu-Chun Su" <scsu@delanet.com>; "William Longo" <wlongo@mastest.com>
Sent: Tuesday, June 24, 2003 1:05 PM
Attach: LB-000027 (MG 6-24-03).doc; pic11872.gif
Subject: RE: EPA Approved w/ attached revisions MOD LB-000027

EPA approves Mod LB-000027 with revisions as attached.
 (See attached file: LB-000027 (MG 6-24-03).doc)
 (Embedded image moved to file: pic11872.gif)

"Beckham, Richard" To: "Beckham, Richard" <BeckhamRE@cdm.com>, 'Charlie LaCerra' <BeckhamRE@cdm.co <clacerra@emsl.com>, 'Charlie LaCerra' <clacerra@emsl.com>, "jeanneorr@resienv.com" m> <jeanneorr@resienv.com>, "rdemalo@emsl.com" <rdemalo@emsl.com>, "rmahoney@emsl.com" <rmahoney@emsl.com>, 'William Longo' <wlongo@mastest.com>, 06/23/03 08:41 AM "rhatfield@mastest.com" <rhatfield@mastest.com>, 'Bill Egeland' <begeland@mastest.com>, "Bob.Shumate@battaenv.com" <Bob.Shumate@battaenv.com>, "Naresh C. Batta" <ncbatta@battaenv.com>, 'Shu-Chun Su' <scsu@delanet.com>, "corbin77@atc-enviro.com" <corbin77@atc-enviro.com>, 'Gustavo Delgado' <gdelgado77@atc-enviro.com>, "Garth B. Freeman" <gfreeman@mastest.com>, "Autio, Anni" <AutioAH@cdm.com>, "Raney@volpe.dot.gov" <Raney@volpe.dot.gov>, "brattin@syrres.com" <brattin@syrres.com>, Mary Goldade/EPR/R8/USEPA/US@EPA, "dmazzaferro@mastest.com" <dmazzaferro@mastest.com>, "mgoldade@peakpeak.com" <mgoldade@peakpeak.com>, "m_szynskie@resienv.com" <m_szynskie@resienv.com>
 cc:

Subject: MOD LB-000027

> This MOD impacts only RESI. For your review and comment:

> - Richard Beckham

> <<LB-000027.doc>>



Mary Goldade

Regional Superfund Chemist

U.S. Environmental Protection Agency, Region 8

999 19th Street, Suite 300

Mail Code: BEPR-PS

Denver, CO 80202

Phone: (303) 312-7024

Fax: (303) 312-6065

email: goldade.mary@epa.gov

6/24/2003



"Raney, Mark"
<RANEY@VOLPE.DOT
.GOV>

07/18/03 05:52 AM

To: "Beckham, Richard" <BeckhamRE@cdm.com>, "Autio, Anni"
<AutioAH@cdm.com>
cc: Mary Goldade/EPR/R8/USEPA/US@EPA, "Goldade, Mary (HOME)"
<mgoldade@peakpeak.com>, "Orr, Jeane at Reservoir Env"
<jeaneorr@resienv.com>, "Mahoney, Ron"
<rmahoney@emsl.com>, "Demalo, Rob (EMSL)"
<rdemalo@emsl.com>, "LaCerra, Charles"
<CLaCerra@emsl.com>

Subject: MODs: LB-000025, 26, 27 & 28

Richard,

LB-000025 (EMSL): Volpe provided approval (with revisions) on 6/18/03 & EPA approved on 5/14/03 (see emails and attachment below). I have yet to see a final version for signature. EMSL should finalize, sign and distribute for signature.

LB-000026 (EMSL): Approved and signed by both Volpe and EPA.

LB-000027 (RESI): MOD provided on 6/23/03 via Richard Beckham, Approved by EPA (with revisions) on 6/24/03. Volpe concurs with EPA and herby provides approval with EPA's revisions (see attached). RESI should finalize, sign and distribute for signature.

LB-000028 (EMSL): MOD provided on 6/23/03 via Richard Beckham, Approved by EPA (with revisions) on 6/24/03. Volpe concurs with EPA and herby provides approval with EPA's revisions (see attached). EMSL should finalize, sign and distribute for signature.

Please let me know if anyone has any questions.

Mark.

-----Original Message-----

From: Beckham, Richard [mailto:BeckhamRE@cdm.com]
Sent: Wednesday, July 16, 2003 5:30 PM
To: 'RANEY@VOLPE.DOT.GOV'; Autio, Anni
Subject: MOD Status

For MODs 27 and 28, I have email approvals from EPA, but have not been able to locate approvals from Volpe. CDM received a hardcopy of 27 with an original signature from RESI, that was subsequently forwarded to Volpe on 7/8/3. (Did I miss an approval email?) To my knowledge, a hardcopy of 28 has not been prepared.

- Richard Beckham

-----Original Message-----

From: Raney, Mark
Sent: Wednesday, June 18, 2003 10:56 AM
To: 'Mahoney, Ron'
Cc: 'Anni Autio'; 'Mary Goldade'
Subject: RE: EPA Markups: MOD LB-000025

Ron,

I concur with Mary's comments below. I provide Volpe's approval for MOD LB-000025 with Mary's changes and the addition of an estimate of the number of samples involved (i.e., < 20).

Thanks,

Mark.

-----Original Message-----

From: Mahoney, Ron [mailto:rmahoney@EMSL.com]
Sent: Wednesday, June 04, 2003 9:27 AM
To: 'Mark Raney'
Cc: 'Anni Autio'; 'Mary Goldade'; CDM STAFF
Subject: FW: EPA Markups: MOD LB-000025

Mark,

Do you have any other comments for this mod? Mary asked for an estimate of the number of samples involved, and we agreed on < 20. The number is more likely < 10, but we've decided to err on the conservative side.

If I can get your input, we can put this one to bed.

R.K. Mahoney
Senior Analyst
Special Projects Coordinator
EMSL Analytical, Inc.
Westmont, NJ
800.220.3675, x1218
rmahoney@emsl.com

-----Original Message-----

From: Mary Goldade [mailto:mgoldade@peakpeak.com]
Sent: Wednesday, May 14, 2003 6:32 PM
To: Beckham, Richard; 'Charlie LaCerra'; jeanneorr@resienv.com;
rdemalo@emsl.com; rmahoney@emsl.com; 'William Longo';
rhatfield@mastest.com; 'Bill Egeland'; Bob.Shumate@battaenv.com; 'Naresh

C. Batta'; 'Shu-Chun Su'; corbin77@atc-enviro.com; 'Gustavo Delgado';
'Garth B. Freeman'; Autio, Anni; Raney@volpe.dot.gov;
brattin@syrres.com; Goldade.mary@EPAMail.epa.gov;
dmazzaferro@mastest.com; m_szynskie@resienv.com
Subject: EPA Markups: MOD LB-000025

Suggested changes to the MOD are attached.

Ron-Do you already have in hand an estimate regarding the actual number of
samples this affects (i.e., are you able to quantify the term
"few/limited"?)

Thanks,

Mary

----- Original Message -----

From: "Beckham, Richard" <BeckhamRE@cdm.com>
To: "'Charlie LaCerra'" <clacerra@emsl.com>; <jeanneorr@resienv.com>;
<rdemalo@emsl.com>; <rmahoney@emsl.com>; "'William Longo'"
<wlongo@mastest.com>; <rhatfield@mastest.com>; "'Bill Egeland'"
<begeland@mastest.com>; <Bob.Shumate@battaenv.com>; "'Naresh C. Batta'"
<ncbatta@battaenv.com>; "'Shu-Chun Su'" <scsu@delanet.com>;
<corbin77@atc-enviro.com>; "'Gustavo Delgado'" <gdelgado77@atc-enviro.com>;
'"Garth B. Freeman"' <gfreeman@mastest.com>; "Autio, Anni"
<AutioAH@cdm.com>; <Raney@volpe.dot.gov>; <brattin@syrres.com>;
<Goldade.mary@EPAMail.epa.gov>; <dmazzaferro@mastest.com>;
<mgoldade@peakpeak.com>; <m_szynskie@resienv.com>
Sent: Wednesday, May 14, 2003 3:28 PM
Subject: MOD LB-000025

> This MOD impacts only EMSL. For your review and comment:

>

> <<LB-000025.doc>>

> - Richard Beckham

<<LB-000025_rev (MG 6-04-03 email).doc>> <<LB-000027 (MG 6-24-03).doc>>

<<LB-000028 (MG 6-24-03).doc>>

>

>

>



LB-000025_rev (MG 6-04-03 email) LB-000027 (MG 6-24-03). LB-000028 (MG 6-24-03).



Request for Modification

To

Laboratory Activities

LB-000028

Instructions to Requester: E-mail form to contacts at bottom of form for review and approval.

File approved copy with Data Manager (CDM). Data Manager distributes approved forms as follows:

All Labs Applicable forms – copies to: EPA, Volpe, CDM, All project labs

Individual Labs Applicable forms – copies to: EPA, Volpe, CDM, Initiating Lab

Method (circle one/those applicable): TEM-AHERA, TEM-ISO 10312, PCM-NIOSH 7400, PLM-NIOSH 9002, EPA/600/R-93/116, ASTM D5755-95, EPA/540/2-90/005a, Other: All TEM Methodologies

Requester: R. K. Mahoney Title: Senior Analyst / Special Projects Coordinator

Company: EMSL Analytical, Inc. Date: 17 June 2003

Description of Modification:

This is a clarification pertaining to the re-analysis of TEM samples when some of the originally read grid openings in a sample selected for re-analysis have become unreadable. In the event that more than half of the originally read grid openings have become unreadable, select the closest adjacent sample from the same sample delivery group with adequate intact grid openings for re-analysis. If half or less of the original openings on the sample selected are unreadable, make note in the Comments box in Data Entry 1 of the TEM EDD as to which grid openings are unreadable, and proceed with analysis of the original sample.

Reason for Modification:

This clarification is intended to provide more complete TEM re-analysis data.

Potential Implications of this Modification:

There are no negative implications to this clarification.

Laboratory Applicability (circle one): All Individual(s) _____

Duration of Modification (circle one):

Temporary Date(s): _____

Analytical Batch ID: _____

Temporary Modification Forms – Attach legible copies of approved form w/ all associated raw data packages

Permanent (Complete Proposed Modification Section) Effective Date: 17 June 2003

Permanent Modification Forms – Maintain legible copies of approved form in a binder that can be accessed by analysts.

Proposed Modification to Method (attach additional sheets if necessary; state section and page numbers of Method when applicable):

Technical Review: R. K. Mahoney EMSL Date: 18 July 2003
(Laboratory Manager or designate)

Project Review and Approval: Mark Roney Date: 7/15/03
(Volpe: Project Technical Lead or designate)

Approved By: Wally Goldade Date: 6/24/03

Title: Project Chemist
(USEPA: Project Chemist or designate)

Mary Goldade
06/24/03 01:20 PM

To: "Beckham, Richard" <BeckhamRE@cdm.com>
cc: "Autio, Anni" <AutioAH@cdm.com>, "Bill Egeland" <begeland@mastest.com>, "Bob.Shumate@battaenv.com" <Bob.Shumate@battaenv.com>, "brattin@syrres.com" <brattin@syrres.com>, "Charlie LaCerra" <clacerra@emsl.com>, "corbin77@atc-enviro.com" <corbin77@atc-enviro.com>, "dmazzaferro@mastest.com" <dmazzaferro@mastest.com>, "Gustavo Delgado" <gdelgado77@atc-enviro.com>, "Garth B. Freeman" <gfreeman@mastest.com>, "jeanneorr@resienv.com" <jeanneorr@resienv.com>, "mgoldade@peakpeak.com" <mgoldade@peakpeak.com>, "m_szynskie@resienv.com" <m_szynskie@resienv.com>, "Naresh C. Batta" <ncbatta@battaenv.com>, "Raney@volpe.dot.gov" <Raney@volpe.dot.gov>, "rdemalo@emsl.com" <rdemalo@emsl.com>, "rhatfield@mastest.com" <rhatfield@mastest.com>, "rmahoney@emsl.com" <rmahoney@emsl.com>, "Shu-Chun Su" <scsu@delanet.com>, "William Longo" <wlongo@mastest.com>
Subject: Re: EPA Approved w/ revisions MOD LB-000028

EPA approves Mod LB-000028 with revisions as attached.



LB-000028 (MG 6-24-03).

Mary Goldade
Regional Superfund Chemist



U.S. Environmental Protection Agency, Region 8
999 19th Street, Suite 300
Mail Code: BEPR-PS
Denver, CO 80202

Phone: (303) 312-7024
Fax: (303) 312-6065
email: goldade.mary@epa.gov

"Beckham, Richard" <BeckhamRE@cdm.com>



"Beckham, Richard"
<BeckhamRE@cdm.com>
06/23/03 08:42 AM

To: "Charlie LaCerra" <clacerra@emsl.com>, "Charlie LaCerra" <clacerra@emsl.com>, "jeanneorr@resienv.com" <jeanneorr@resienv.com>, "rdemalo@emsl.com" <rdemalo@emsl.com>, "rmahoney@emsl.com" <rmahoney@emsl.com>, "William Longo" <wlongo@mastest.com>, "rhatfield@mastest.com" <rhatfield@mastest.com>, "Bill Egeland" <begeland@mastest.com>, "Bob.Shumate@battaenv.com" <Bob.Shumate@battaenv.com>, "Naresh C. Batta" <ncbatta@battaenv.com>, "Shu-Chun Su" <scsu@delanet.com>, "corbin77@atc-enviro.com" <corbin77@atc-enviro.com>, "Gustavo Delgado" <gdelgado77@atc-enviro.com>, "Garth B. Freeman" <gfreeman@mastest.com>, "Autio, Anni" <AutioAH@cdm.com>, "Raney@volpe.dot.gov" <Raney@volpe.dot.gov>, "brattin@syrres.com" <brattin@syrres.com>, Mary Goldade/EPR/R8/USEPA/US@EPA, "dmazzaferro@mastest.com" <dmazzaferro@mastest.com>, "mgoldade@peakpeak.com" <mgoldade@peakpeak.com>, "m_szynskie@resienv.com" <m_szynskie@resienv.com>

cc:

Subject: MOD LB-000028

This MOD impacts all labs. For your review and comment.

- Richard Beckham

<<LB-000028.doc>>

From: "LaCerra, Charles" <CLaCerra@EMSL.com>
To: "Carr, Kim" <KCarr@EMSL.com>; "EMSL Mobile Lab - Asbestos" <mobileasbestoslab@EMSL.com>
Sent: Friday, July 18, 2003 5:57 AM
Attach: LB-000025_rev (MG 6-04-03 email).doc; LB-000027 (MG 6-24-03).doc; LB-000028 (MG 6-24-03).doc
Subject: FW: MODs: LB-000025, 26, 27 & 28

-----Original Message-----

From: Raney, Mark [mailto:RANEY@VOLPE.DOT.GOV]
Sent: Friday, July 18, 2003 7:53 AM
To: 'Beckham, Richard'; Autio, Anni
Cc: 'Goldade, Mary'; 'Goldade, Mary (HOME)'; 'Orr, Jeaane at Reservoir
Env'; 'Mahoney, Ron'; 'Demalo, Rob (EMSL)'; 'LaCerra, Charles'
Subject: MODs: LB-000025, 26, 27 & 28

Richard,

LB-000025 (EMSL): Volpe provided approval (with revisions) on 6/18/03 & EPA approved on 5/14/03 (see emails and attachment below). I have yet to see a final version for signature. EMSL should finalize, sign and distribute for signature.

LB-000026 (EMSL): Approved and signed by both Volpe and EPA.

LB-000027 (RESI): MOD provided on 6/23/03 via Richard Beckham, Approved by EPA (with revisions) on 6/24/03. Volpe concurs with EPA and herby provides approval with EPA's revisions (see attached). RESI should finalize, sign and distribute for signature.

LB-000028 (EMSL): MOD provided on 6/23/03 via Richard Beckham, Approved by EPA (with revisions) on 6/24/03. Volpe concurs with EPA and herby provides approval with EPA's revisions (see attached). EMSL should finalize, sign and distribute for signature.

Please let me know if anyone has any questions.

Mark.

-----Original Message-----

From: Beckham, Richard [mailto:BeckhamRE@cdm.com]

Sent: Wednesday, July 16, 2003 5:30 PM

To: 'RANEY@VOLPE.DOT.GOV'; Autio, Anni

Subject: MOD Status

For MODs 27 and 28, I have email approvals from EPA, but have not been able

to locate approvals from Volpe. CDM received a hardcopy of 27 with an original signature from RESI, that was subsequently forwarded to Volpe on

7/8/3. (Did I miss an approval email?) To my knowledge, a hardcopy of 28

has not been prepared.

- Richard Beckham

-----Original Message-----

From: Raney, Mark

Sent: Wednesday, June 18, 2003 10:56 AM

To: 'Mahoney, Ron'

Cc: 'Anni Autio'; 'Mary Goldade'

Subject: RE: EPA Markups: MOD LB-000025

Ron,

I concur with Mary's comments below. I provide Volpe's approval for MOD LB-000025 with Mary's changes and the addition of an estimate of the number of samples involved (i.e., < 20).

Thanks,

Mark.

-----Original Message-----

From: Mahoney, Ron [mailto:Rmahoney@EMSL.com]

Sent: Wednesday, June 04, 2003 9:27 AM

To: 'Mark Raney'

7/18/2003

Cc: 'Anni Autio'; 'Mary Goldade'; CDM STAFF
 Subject: FW: EPA Markups: MOD LB-000025

Mark,

Do you have any other comments for this mod? Mary asked for an estimate of the number of samples involved, and we agreed on < 20. The number is more likely < 10, but we've decided to err on the conservative side.

If I can get your input, we can put this one to bed.

R.K. Mahoney
 Senior Analyst
 Special Projects Coordinator
 EMSL Analytical, Inc.
 Westmont, NJ
 800.220.3675, x1218
rmahoney@emsl.com

-----Original Message-----

From: Mary Goldade [mailto:mgoldade@peakpeak.com]
 Sent: Wednesday, May 14, 2003 6:32 PM
 To: Beckham, Richard; 'Charlie LaCerra'; jeanneorr@resienv.com; rdemalo@emsl.com; rmahoney@emsl.com; 'William Longo'; rhatfield@mastest.com; 'Bill Egeland'; Bob.Shumate@battaenv.com; 'Naresh C. Batta'; 'Shu-Chun Su'; corbin77@atc-enviro.com; 'Gustavo Delgado'; 'Garth B. Freeman'; Autio, Anni; Raney@volpe.dot.gov; brattin@syrrs.com; Goldade.mary@EPAMail.epa.gov; dmazzaferro@mastest.com; m_szynskie@resienv.com
 Subject: EPA Markups: MOD LB-000025

Suggested changes to the MOD are attached.
 Ron-Do you already have in hand an estimate regarding the actual number of samples this affects (i.e., are you able to quantify the term "few/limited"?)

Thanks,
 Mary

----- Original Message -----

From: "Beckham, Richard" <BeckhamRE@cdm.com>
 To: "'Charlie LaCerra'" <clacerra@emsl.com>; <jeanneorr@resienv.com>; <rdemalo@emsl.com>; <rmahoney@emsl.com>; "'William Longo'" <wlongo@mastest.com>; <rhatfield@mastest.com>; "'Bill Egeland'" <begeland@mastest.com>; <Bob.Shumate@battaenv.com>; "'Naresh C. Batta'" <ncbatta@battaenv.com>; "'Shu-Chun Su'" <scsu@delanet.com>;

7/18/2003

<corbin77@atc-enviro.com>; "Gustavo Delgado"
<gdelgado77@atc-enviro.com>;
"Garth B. Freeman" <gfreeman@mastest.com>; "Autio, Anni"
<AutioAH@cdm.com>; <Raney@volpe.dot.gov>; <brattin@syrres.com>;
<Goldade.mary@EPAMail.epa.gov>; <dmazzaferro@mastest.com>;
<mgoldade@peakpeak.com>; <m_szynskie@resienv.com>

Sent: Wednesday, May 14, 2003 3:28 PM

Subject: MOD LB-000025

> This MOD impacts only EMSL. For your review and comment:

>

> <<LB-000025.doc>>

> - Richard Beckham

<<LB-000025_rev (MG 6-04-03 email).doc>> <<LB-000027 (MG
6-24-03).doc>> <<LB-000028 (MG 6-24-03).doc>>

>

>

>

Mary Goldade

07/29/03 01:57 PM

To: Anni Autio
cc: Mark Raney
cc:

Subject: LB-000027 & LB-000028 are signed and mailed

Anni & Joe,

I have mail you the original copiew of the mods LB-000027 & LB-000028.
Several of the email approval pages were not provided. I attached them.

Mary Goldade

Regional Superfund Chemist



U.S. Environmental Protection Agency, Region 8
999 19th Street, Suite 300
Mail Code: BEPR-PS
Denver, CO 80202

Phone: (303) 312-7024

Fax: (303) 312-6065

email: goldade.mary@epa.gov



Request for Modification

To
Laboratory Activities
LB-000029

**Instructions to Requester: E-mail form to contacts at bottom of form for review and approval.
File approved copy with Data Manager (CDM). Data Manager distributes approved forms as follows:**

All Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, All project labs

Individual Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, Initiating Lab

Method (circle one/those applicable): TEM-AHERA, TEM-ISO 10312, PCM-NIOSH 7400, PLM-NIOSH 9002,
EPA/600/R-93/116, ASTM D5755-95, EPA/540/2-90/005a, Other: All other TEM methods, including:
SOP EPA-LIBBY-03, SOP EPA-LIBBY-07, and EPA/600/R-94/134 (EPA 100.2).

Requester: W.J. Brattin

Title: Technical consultant

Company: Syracuse Research Corporation

Date: 25 August 2003

Description of Modification:

Permanent clarifications to laboratory-based Quality Control (QC) sample analysis. The purpose of the attached is to standardize the frequency of analysis and procedures for interpretation of the results for laboratory-based Quality Control (QC) samples for TEM analyses (all media).

Reason for Modification:

This modification is needed to standardize the frequency with which different types of QC samples are prepared in different laboratories in the program, and to ensure that all results are evaluated in accord with a standard set of criteria.

Potential Implications of this Modification:

There are no potential negative implications resulting from this standardization of QC procedures.

Laboratory Applicability (circle one): All Individual: _____

Duration of Modification (circle one):

Temporary Date(s): _____

Analytical Batch ID: _____

Temporary Modification Forms – Attach legible copies of approved form w/ all associated raw data packages

Permanent

(complete Proposed Modification Section)

Effective Date: 8/26/03 (insert based on date of final approval)

Permanent Modification Forms – Maintain legible copies of approved form in a binder that can be accessed by analysts.

Proposed Modification to Method (attach additional sheets if necessary; state section and page numbers of Method when applicable):

Technical Review: WJ Brattin
(Laboratory Manager or designate)

Date: 8/26/03

Project Review and Approval: Mark Ly
(Volpe: Project Technical Lead or designate)

Date: 8/27/03

Approved By: Laey Goldade
(USEPA: Project Chemist or designate)

Date: 8/26/03

Frequency

The frequency for laboratory-based QC samples for TEM analyses (all media combined) shall be as follows:

QC Sample Type	Frequency
Lab blank	4%
Recount same	1%
Recount different	2.5%
Reprep	1%
Verified analysis	1%
Interlab	0.5%
Total	10%

Each laboratory should prepare and analyze lab blanks, recount (same, different and verified), and reprep samples selected at random in accord with this table. Samples for interlab comparisons will be designated on the COC sheets accompanying the samples.

Procedure for Evaluating QC Samples and Responses to Exceptions

The procedure for evaluating QC sample results varies depending on sample type. These procedures are presented below.

Note: the procedures for evaluating QC samples presented below are based in part on professional judgement and experience at the site to date. These procedures and rules for interpretation may be revised as more data are collected.

Lab Blanks

There shall be no asbestos structure of any type detected in an analysis of 10 grid openings on any lab blank. If one or more asbestos structures are detected, the laboratory shall immediately investigate the source of the contamination and take immediate steps to eliminate the source of contamination.

Re-Analysis.

All re-analysis samples (same, different, interlab, and verified) will be evaluated by comparing the raw data sheets prepared by each analyst. Note that the raw data for samples must include sketches for both the initial and QC reanalysis, as described in modification LB-000030. The following criteria will be used to identify cases where results are concordant (in agreement) or discordant (not in agreement). These criteria were established by microscopists experienced in the analysis of Libby amphibole asbestos, and serve as an initial attempt at review criteria developed using their professional experience. As the database continues to grow and we learn more, these criteria may be revisited and revised. Changes to the criteria will be accompanied by scientific justification to support the change.

Measurement parameter	Concordance Rule
Number of asbestos structures within each grid opening	For grid openings with 10 or fewer structures, counts must match exactly. For grid openings with more than 10 structures, counts must be within 10%.
Asbestos class of structure (LA, OA, C)	Must agree 100% on chrysotile vs amphibole. For assignment of amphiboles to LA or OA bins, must agree on at least 90% of all amphibole structures.
Structure length	For fibers and bundles, must agree within 0.5 um or 10% (whichever is less stringent) For clusters and matrices, must agree within 1 um or 20% (whichever is less stringent)
Structure width	For fibers and bundles, must agree within 0.5 um or 20% (whichever is less stringent). For clusters and matrices, there is no quantitative rule for concordance.

Whenever a recount occurs in which there is one or more discordance, the sample will undergo verified analysis as described by NIST (1994), and the senior laboratory analyst will use the results of the validated analysis to determine the basis of the discordance, and will then take appropriate corrective action (e.g., re-training in counting rules, quantification of size, identification of types, etc). Whichever analytical result is determined to be correct will be identified with the word "Confirmed" in the sample comment field of the electronic data reporting sheet. In the special case where the original and the reanalysis are both determined to have one or more errors, a third electronic data report will be prepared that contains the correct results. This will be identified as QA Type = "Reconciliation". The laboratory should maintain records of all cases of discordant results and of actions taken to address any problems, in accord with the usual procedures and requirements of NVLAP. In addition, each laboratory should notify the CDM Laboratory Manager of any significant exceptions and corrective actions through a job-specific (temporary) modification form. The CDM Lab Manager will ensure that appropriate Volpe and EPA representatives are notified accordingly.

Re-Preparation.

Re-preparation samples will be evaluated by comparing the total counts for the original and the re-preparation samples. In order to be ranked as concordant, the results must not be statistically different from each other at the 90% confidence interval, tested using the statistical procedure documented in Attachment 1. Whenever an exception is identified, a senior analyst shall determine the basis of the discordant results, and if it is judged to be related to laboratory procedures (as opposed to unavoidable variability in the sample), the laboratory shall then take appropriate corrective action (e.g., re-training in sample and filter preparation, counting rules, quantification of size, identification of types, etc).

Program-Wide Goals

While each lab shall monitor the results of the QC samples analyzed within their lab and shall take actions as described above, the overall performance of the program shall be monitored by assembling summary statistics on QC samples, combining data within and across laboratories. The program-wide goals shall be interpreted as follows:

Sample Type	Metric	Program-Wide Criteria		
		Good	Acceptable	Poor
Lab Blanks	% with ≥ 1 asbestos structures	0% - 0.1%	0.2% - 0.5%	>0.5%
Recount Samples	Concordance on count	>95%	85-95%	<85%
	Concordance on type (Chrys vs amphibole)	>99%	95%-99%	<95%
	Concordance on length	>90%	80%-90%	<80%
	Concordance on width	>90%	80%-90%	<80%
Reprep	Concordance on count	>95%	90-95%	<90%

As the database continues to grow and we learn more, these project-wide goals may be revisited and revised. Changes to the project-wide goals will be accompanied by appropriate justification to support the change.

REFERENCES

NIST. 1994. Airborne Asbestos Method: Standard Test method for Verified Analysis of Asbestos by Transmission Electron Microscopy – Version 2.0. National Institute of Standards and Technology, Washington DC. NISTIR 5351. March 1994.

Nelson W. 1982. Applied Life Data Analysis. John Wiley & Sons, New York. pp 438-446.

ATTACHMENT 1

STATISTICAL COMPARISON OF TWO POISSON RATES

1.0 INTRODUCTION

An important part of the Quality Control plan for this project is the re-preparation and re-analysis of a number of TEM grids for quantification of asbestos fiber concentrations in environmental media (air, dust, water, soil). Because of random variation, it is not expected that results from re-preparations samples should be identical. This appendix presents the statistical method for comparing two measurements and determining whether they are statistically different or not.

2.0 STATISTICAL METHOD

This method is taken from the textbook entitled "Applied Life Data Analysis" (Nelson 1982). Input values required for the test are as follows:

- Y1 = Fiber count in first evaluation
- t1 = Number of grid openings in first evaluation
- Y2 = Fiber count in second evaluation
- t2 = Number of grid openings in second evaluation

The test is performed by following the following steps:

Step 1:

Calculate $Y = (Y1 + Y2) / 2$
 $t = (t1 + t2) / 2$
 $\lambda = Y / t$

Step 2:

Calculate $Q = (Y1 - Y)^2 / (\lambda \cdot t1) + (Y2 - Y)^2 / (\lambda \cdot t2)$

Step 3:

Compare Q to the critical value of CHISQ(1- α ,1) from the following table:

Alpha	CHISQ(1- α ,1)
0.05	3.841
0.10	2.706
0.20	1.642
0.30	1.074

If Q is less than or equal to CHISQ(1- α ,1), conclude that the two results are not statistically different at the 100(1- α)% confidence level.

If Q is greater than CHISQ(1- α ,1), conclude that the two results are statistically different at the 100(1- α)% confidence level.

Kwiatkowski, Joseph

From: Autio, Anni
Sent: Tuesday, August 12, 2003 4:05 PM
To: Kwiatkowski, Joseph
Subject: FW: EPA Approved: Mod LB-000029 EPA revisions attached



LB-000029 v4
(MR 8-12-03).doc

-----Original Message-----

From: Raney, Mark [mailto:RANEY@VOLPE.DOT.GOV]
Sent: Tuesday, August 12, 2003 4:08 PM
To: 'Goldade.Mary@epamail.epa.gov'; William Brattin
Cc: Autio, Anni
Subject: RE: EPA Approved: Mod LB-000029 EPA revisions attached

I concur with the additions as provided by Mary in LB-000029 v3 (MG 8-12-03).doc, with the one exception as changed by the attached. Specifically I recommend changing "first attempt" (under the Re-Analysis Section) to "initial", i.e., so that it reads ".....microscopists experienced in the analysis of Libby amphibole asbestos and serve as initial review criteria developed using their professional experience."

Bill, once the appropriate changes have been made please sign and submit the mod for signature.

Mark

-----Original Message-----

From: Goldade.Mary@epamail.epa.gov [mailto:Goldade.Mary@epamail.epa.gov]
Sent: Tuesday, August 12, 2003 3:35 PM
To: William Brattin
Cc: Mark Raney; autioah@cdm.com
Subject: EPA Approved: Mod LB-000029 EPA revisions attached

Please see attached. Mark, please review and approve and/or comment ASAP.

Thanks.

(See attached file: LB-000029 v3 (MG 8-12-03).doc)
(Embedded image moved to file: pic28392.gif)

William Brattin
<brattin@syrres.c
om>

08/12/03 11:12 AM

To: Mark Raney <raney@volpe.dot.gov>
cc: Mary Goldade/EPR/R8/USEPA/US@EPA
Subject:



Request for Modification

To

Laboratory Activities

LB-000030

Instructions to Requester: E-mail form to contacts at bottom of form for review and approval.

File approved copy with Data Manager (CDM). Data Manager distributes approved forms as follows:

All Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, All project labs

Individual Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, Initiating Lab

Method (circle one/those applicable): TEM-AHERA, TEM-ISO 10312, PCM-NIOSH 7400, PLM-NIOSH 9002, EPA/600/R-93/116, ASTM D5755-95, EPA/540/2-90/005a, Other: EPA/600/R-94/134 (EPA 100.2)

Requester: W.J. Brattin

Title: Technical consultant

Company: Syracuse Research Corporation

Date: 5 August 2003

Description of Modification:

All samples analyzed by TEM shall include sketches of all asbestos structures observed, up to a maximum of 50 structures in a sample. These sketches need not be highly detailed, but should include an indication of structure appearance and orientation relative to any nearby landmarks, if present.

morphology,

Reason for Modification:

This modification is needed to standardize the procedure used by each laboratory for recording sketches of asbestos structures. One benefit of this modification is that samples for verified analysis no longer need to be identified before analysis.

Potential Implications of this Modification:

There are no potential negative implications resulting from this standardization of QC procedures.

Laboratory Applicability (circle one): All

Individual: _____

Duration of Modification (circle one):

Temporary

Date(s): _____

Analytical Batch ID: _____

Temporary Modification Forms – Attach legible copies of approved form w/ all associated raw data packages

Permanent

(complete Proposed Modification Section)

Effective Date: 8/14/03 (insert based on date of final approval)

Permanent Modification Forms – Maintain legible copies of approved form in a binder that can be accessed by analysts.

Proposed Modification to Method (attach additional sheets if necessary; state section and page numbers of Method when applicable):

Technical Review: WJ Brattin

(Laboratory Manager or designate)

Date: 8/14/03

Project Review and Approval: [Signature]

(Volpe: Project Technical Lead or designate)

Date: 8/14/03

Approved By: [Signature]

(USEPA: Project Chemist or designate)

Date: 8/14/03

Autio, Anni

From: Goldade.Mary@epamail.epa.gov
Sent: Thursday, August 07, 2003 10:43 AM
To: Autio, Anni
Cc: Bob Shumate; Charlie LaCerra; Kyeong Corbin; Denise Mazzaferro; Gustavo Delgado; Garth Freeman; Jeanne Orr; Kwiatkowski, Joseph; Marie Cash; 'EMSL Mobile Lab - Asbestos'; ncbatta@battaenv.com; Mark Raney (raney@volpe.dot.gov); Rob DeMalo; Richard Hatfield; Ron Mahoney; Shu-Chun Su; Bill Longo
Subject: EPA Comments: LB-000030 (Draft for review/comment)



LB-000030 v0 (MG pic08313.gif (3 KB)
08-07-03).doc...

Attached are my recommended mark-ups. I also included Jeanne's recommendation of "if present" after landmarks. Please review and comment as nec.

One other point of clarification....when we discussed this, we were focused on AHERA. Just want to make sure it's OK w/ all to include TEM ISO on this list of circled methods. Thanks, Mary (See attached file: LB-000030 v0 (MG 08-07-03).doc) (Embedded image moved to file: pic08313.gif)



Request for Modification
To
Laboratory Activities
LB-000030

Instructions to Requester: E-mail form to contacts at bottom of form for review and approval.
File approved copy with Data Manager (CDM). Data Manager distributes approved forms as follows:

All Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, All project labs

Individual Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, Initiating Lab

Method (circle one/those applicable): TEM-AHERA, TEM-ISO 10312, PCM-NIOSH 7400, PLM-NIOSH 9002,
EPA/600/R-93/116, ASTM D5755-95, EPA/540/2-90/005a, Other: EPA/600/R-94/134 (EPA 100.2)

Requester: W.J. Bratlin Title: Technical consultant
Company: Syracuse Research Corporation Date: 5 August 2003

Description of Modification:

All samples analyzed by TEM shall include sketches of all asbestos structures observed, up to a maximum of 50 structures in a sample. These sketches need not be highly detailed, but should include an indication of structure appearance, morphology and orientation relative to any nearby landmarks, if present.

Deleted: _____

Reason for Modification:

This modification is needed to standardize the procedure used by each laboratory for recording sketches of asbestos structures. One benefit of this modification is that samples for verified analysis no longer need to be identified before analysis and will be randomly selected by the laboratory's supervisor or designate following analysis.

Potential Implications of this Modification:

There are no potential negative implications resulting from this standardization of QC procedures, but a benefit is that samples selected for verified analyses will be unknown to the microscopist prior to analysis.

Laboratory Applicability (circle one): All Individual: _____

Duration of Modification (circle one):

Temporary Date(s): _____

Analytical Batch ID: _____

Temporary Modification Forms – Attach legible copies of approved form w/ all associated raw data packages

Permanent (complete Proposed Modification Section) Effective Date: (insert based on date of final approval)

Permanent Modification Forms – Maintain legible copies of approved form in a binder that can be accessed by analysts.

Proposed Modification to Method (attach additional sheets if necessary; state section and page numbers of Method when applicable):

Deleted: _____

Technical Review: _____ Date: _____
(Laboratory Manager or designate)

Project Review and Approval: _____ Date: _____
(Volpe: Project Technical Lead or designate)

Approved By: _____ Date: _____
(USEPA: Project Chemist or designate)

Autio, Anni

From: DeMalo, Robert [RDeMalo@EMSL.com]
Sent: Thursday, August 07, 2003 11:20 AM
To: Goldade.Mary@epamail.epa.gov; Autio, Anni
Cc: Bob Shumate; LaCerra, Charles; Kyeong Corbin; Denise Mazzaferro; Gustavo Delgado; Garth Freeman; Jeanne Orr; Kwiatkowski, Joseph; Marie Cash; EMSL Mobile Lab - Asbestos; ncbatta@battaenv.com; Mark Raney (raney@volpe.dot.gov); Richard Hatfield; Mahoney, Ron; Shu-Chun Su; Bill Longo
Subject: RE: EPA Comments: LB-000030 (Draft for review/comment)

I propose adding the word "morphology" as well into the description, as noted. I have no problem with including ISO to this procedure.

-----Original Message-----

From: Goldade.Mary@epamail.epa.gov [mailto:Goldade.Mary@epamail.epa.gov]
Sent: Thursday, August 07, 2003 10:43 AM
To: Autio, Anni
Cc: Bob Shumate; Charlie LaCerra; Kyeong Corbin; Denise Mazzaferro; Gustavo Delgado; Garth Freeman; Jeanne Orr; Kwiatkowski, Joseph; Marie Cash; 'EMSL Mobile Lab - Asbestos'; ncbatta@battaenv.com; Mark Raney (raney@volpe.dot.gov); Rob DeMalo; Richard Hatfield; Ron Mahoney; Shu-Chun Su; Bill Longo
Subject: EPA Comments: LB-000030 (Draft for review/comment)

Attached are my recommended mark-ups. I also included Jeanne's recommendation of "if present" after landmarks. Please review and comment as nec.

One other point of clarification....when we discussed this, we were focused on AHERA. Just want to make sure it's OK w/ all to include TEM ISO on this list of circled methods. Thanks, Mary (See attached file: LB-000030 v0 (MG 08-07-03).doc) (Embedded image moved to file: pic08313.gif)

Autio, Anni

From: Raney, Mark [RANEY@VOLPE.DOT.GOV]
Sent: Thursday, August 14, 2003 10:41 AM
To: 'Goldade.Mary@epamail.epa.gov'; Autio, Anni
Cc: Bob Shumate; Charlie LaCerra; Kyeong Corbin; Denise Mazzaferro; Gustavo Delgado; Garth Freeman; Jeanne Orr; Kwiatkowski, Joseph; Marie Cash; 'EMSL Mobile Lab - Asbestos'; ncbatta@battaenv.com; Raney, Mark; Rob DeMalo; Richard Hatfield; Ron Mahoney; Shu-Chun Su; Bill Longo
Subject: RE: EPA Comments: LB-000030 (Draft for review/comment)



LB-000030 v0 (MR
08-14-03).doc...

I concur with Mary's recommendations and mark-ups. The attached version also includes Rob Demalo's recommendation of adding morphology under the description section. Bill please finalize, sign and send it through the signature process. To expedite the process could you get Mary to sign before providing the original on for my signature. Let me know if you have any questions.

Thanks,

Mark.

-----Original Message-----

From: Goldade.Mary@epamail.epa.gov [mailto:Goldade.Mary@epamail.epa.gov]
Sent: Thursday, August 07, 2003 10:43 AM
To: Autio, Anni
Cc: Bob Shumate; Charlie LaCerra; Kyeong Corbin; Denise Mazzaferro; Gustavo Delgado; Garth Freeman; Jeanne Orr; Kwiatkowski, Joseph; Marie Cash; 'EMSL Mobile Lab - Asbestos'; ncbatta@battaenv.com; Mark Raney (raney@volpe.dot.gov); Rob DeMalo; Richard Hatfield; Ron Mahoney; Shu-Chun Su; Bill Longo
Subject: EPA Comments: LB-000030 (Draft for review/comment)

Attached are my recommended mark-ups. I also included Jeanne's recommendation of "if present" after landmarks. Please review and comment as nec.

One other point of clarification....when we discussed this, we were focused on AHERA. Just want to make sure it's OK w/ all to include TEM ISO on this list of circled methods. Thanks, Mary (See attached file: LB-000030 v0 (MG 08-07-03).doc) (Embedded image moved to file: pic08313.gif)



Request for Modification

To
Laboratory Activities
LB-000030

Instructions to Requester: E-mail form to contacts at bottom of form for review and approval.
File approved copy with Data Manager (CDM). Data Manager distributes approved forms as follows:

All Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, All project labs

Individual Lab Applicable forms – copies to: EPA, Volpe, CDM-Denver, Initiating Lab

Method (circle one/those applicable): TEM-AHERA, TEM-ISO 10312, PCM-NIOSH 7400, PLM-NIOSH 9002,
EPA/600/R-93/116, ASTM D5755-95, EPA/540/2-90/005a, Other: EPA/600/R-94/134 (EPA 100.2)

Requester: W.J. Brattin Title: Technical consultant
Company: Syracuse Research Corporation Date: 5 August 2003

Description of Modification:

All samples analyzed by TEM shall include sketches of all asbestos structures observed, up to a maximum of 50 structures in a sample. These sketches need not be highly detailed, but should include an indication of structure appearance, morphology and orientation relative to any nearby landmarks, if present.

Deleted: _____

Reason for Modification:

This modification is needed to standardize the procedure used by each laboratory for recording sketches of asbestos structures. One benefit of this modification is that samples for verified analysis no longer need to be identified before analysis and will be randomly selected by the laboratory's supervisor or designate following analysis.

Potential Implications of this Modification:

There are no potential negative implications resulting from this standardization of QC procedures, but a benefit is that samples selected for verified analyses will be unknown to the microscopist prior to analysis.

Laboratory Applicability (circle one): All Individual: _____

Duration of Modification (circle one):

Temporary Date(s): _____

Analytical Batch ID: _____

Temporary Modification Forms – Attach legible copies of approved form w/ all associated raw data packages

Permanent (complete Proposed Modification Section) Effective Date: (insert based on date of final approval) _____

Permanent Modification: Forms – Maintain legible copies of approved form in a binder that can be accessed by analysts.

Proposed Modification to Method (attach additional sheets if necessary; state section and page numbers of Method when applicable): _____

Deleted: _____

Technical Review: _____ Date: _____
(Laboratory Manager or designate)

Project Review and Approval: _____ Date: _____
(Volpe: Project Technical Lead or designate)

Approved By: _____ Date: _____
(USEPA: Project Chemist or designate)